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ABSTRACT

Accreditation of public postsecondary occupational education is discussed critically and in depth. Alternatives are offered for the diversity which characterizes accreditation at this level of education. Manuscripts are included for the following presentations: (1) "The American Vocational Association and the Development of Standards for Occupational Education" by Lane C. Ash, (2) "The Continuing Need for Nongovernmental Accreditation" by Frank G. Dickey, (3) "Specialized Accrediting Agency Activities in Occupational Education" by Jerry W. Miller, (4) "The Role of the Accreditation and Institutional Eligibility Staff of the U.S. Office of Education in Accreditation of Postsecondary Occupational Education" by John R. Proffitt, (5) "Accreditation of Postsecondary Occupational Education in Perspective: Issues and Alternatives" by William K. Seldon, (6) "The Community Junior College Approach to Specialized Program Accreditation" by K. G. Skaggs, and (7) "The Current State of Accreditation of Postsecondary Occupational Education in the United States" by Charles F. Ward. Also included are "Six Guidelines" developed by The National Study for Accreditation of Vocational Technical Education, American Vocational Association, and a synopsis of The National Study for Accreditation of Vocational Technical Education, a project of the American Vocational Association. (CH)

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SPEECHES PRESENTED AT NATIONAL CONFERENCE
ON ACCREDITATION OF PUBLIC
POSTSECONDARY OCCUPATIONAL EDUCATION

(Atlanta, Georgia, June 10-12, 1970)

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THE ROLE OF THE ACCREDITATION AND INSTITUTIONAL ELIGIBILITY STAFF OF THE U.S. OFFICE OF EDUCATION IN ACCREDITATION OF POSTSECONDARY OCCUPATIONAL EDUCATION

BY: JOHN R. PROFFITT

National Conference on Accreditation of
Public Postsecondary Occupational
Education, June 10-12, 1970, Atlanta, Georgia

I have been asked to speak today on the subject of "The Role of the Accreditation and Institutional Eligibility Staff of the U.S. Office of Education in Accreditation of Postsecondary Occupational Education." Given a title such as this, where we refer to the "role" of a government agency in the accreditation of a major area of American education, I believe that it might be proper initially to assure everyone that the U.S. Office of Education is not about to embark on the task of accrediting occupational education. The Office of Education is committed to the proposition that accreditation, as a vital educational function, appropriately should be conducted by responsible private agencies. However, it may be expected to remain committed to that position only so long as this is in the best interests of the general public.

Well, if the Office of Education is not going to commence actually accrediting occupational education schools and programs, it might well be asked if it has any role to perform in this area at all. The answer to that is that it most definitely does have an appropriate role to perform. The nature of the contemporary American society, the importance of quality education for all citizens, and the extensive interrelationship of government with the educational endeavor of the Nation , all are factors dictating a vital interest and a positive role in this area on the part of the Office of Education.

In general terms, it is the role of the Accreditation and Institutional Eligibility Staff to serve as the Office of Education's agent in supporting constructive developments within the education community insofar as accreditation is concerned, in serving as a catalyst and stimulator in improving accreditation, in protecting the Federal interest, and - finally, but most importantly - in protecting the general public interest as accreditation impinges upon that interest.

The specific major functions of the Accreditation and Institutional Eligibility Staff are as follows:

1. Continuous review of procedures, policies and issues in the area of the Office of Education's interests and responsibilities relative to accreditation and eligibility for funding;
2. Administration of the eligibility for funding process;
3. Administration of the process whereby accrediting associations secure initial and renewed recognition by the Commissioner of Education;
4. Liaison with accrediting associations;
5. Consultative services to institutions, associations, other Federal agencies, and Congress regarding accreditation and eligibility for funding matters;
6. Interpretation and dissemination of policy relative to accreditation and eligibility for funding issues in the case of all appropriate programs administered by the Office of Education;

7. Conduct and stimulation of appropriate research; and

8. Support for the Commissioner's Advisory Committee on Accreditation and Institutional Eligibility.

How, then does the above relate to our role in the accreditation of postsecondary occupational education?

One of the significant features of the development of American education during the decade of the 1960's has been what we might well call a "coming of age" for postsecondary vocational-technical-occupational education. And as we look forward into the decade of the 1970's it seems safe to prophesy that occupational education will continue to enjoy considerable growth and development. And like all growth situations, it is likely to have its growth pains.

Now, in the past, accreditation has been of little relevance or significance to postsecondary occupational education. However, in this developmental era into which we now have moved, this is no longer true. The important role which accreditation has to play, and the contributions which it can make to the sound development of occupational education has led to an increasingly intense interest in accreditation for vocational-technical education on the part of all those interested in the development of this area of education. Accreditation has a vital public role to play in American society today, and if properly developed and conducted, it should be a major constructive tool for vocational-technical education. If we are going to have a healthy society, we must have a healthy system of postsecondary vocational-technical education.

Vocational education is a distinct, yet highly diverse sector of American education. As such, it has its own special needs, problems, techniques, and strengths. And while it may learn much from educators in other fields, they may also learn much from educators in the vocational-technical field. But, at the same time, vocational educators have no intention of being dominated by educators from other fields or of being forced into false patterns of operation. Therefore, I would emphasize to you today that, in order for accreditation to be accepted by the vocational-education community and by those many others of us who are the friends of vocational education, accreditation for vocational education largely must be developed and conducted by the vocational education community.

But not only must vocational educators be given their rightful responsibility in the accreditation process, they also have a right to expect that valid and reasonably uniform standards will be developed for the accreditation of occupational education programs and schools. I seriously doubt if there is today any educationally sound reason why the standards for accreditation of vocational schools should markedly vary from one state or region to another. If there are such reasons, the burden of proof for this variance lies with the accrediting agencies themselves.

The most important question for the Office of Education concerning the accreditation of postsecondary occupational education, of course, has to do with the nature of its future course of development - or lack of such. And as we look into the future, I would assure you that the Office can be expected to support accreditation for occupational education only to the extent that the following concepts are incorporated within such an accreditation effort:

1. Vocational education is a distinct and unique sector of American education. It is also a highly diverse sector of the educational spectrum, and a type of education which is increasingly intermingled (for better or for worse) with traditional academic education within the same institutional setting.

2. Vocational education is rapidly emerging as a dynamic and important segment of education. The achievement of vital social goals is inseparably bound to a flourishing system of quality vocational education directly oriented to the needs of employers and students.
3. Developments which would benefit the area of vocational education would also benefit American education as a whole.
4. Educators involved in accreditation of other sectors of education have a vital leadership and supportive role, and a responsibility to assist, in the development of accreditation for vocational education.
5. Accreditation for vocational education, if it is to be valid, ultimately must be developed, accepted and conducted by the vocational education community.
6. Accrediting bodies are performing an increasingly important societal role, and the residual function of accreditation for postsecondary occupational education must be to protect the public interest.

NATIONAL CONFERENCE ON ACCREDITATION OF PUBLIC POSTSECONDARY OCCUPATIONAL EDUCATION

T-645

"The American Vocational Association and the Development of Standards for Occupational Education"

Lane C. Ash, Director, AVA Accreditation Study

Some years ago, the AVA learned that some institutions were being accredited with little attention paid to the amount of quality of vocational education programs offered in them. This was distressing because some of these institutions claimed to be comprehensive yet they were not. Then, as now, State Boards for Vocational Education approved local programs to receive federal funds. All programs are conducted in accordance with the provisions of the State Plan for vocational education. Some have looked upon this as federal control. However, minumum standards are applied by the states in order for local programs to be eligible for state and federal funding. As the National program has greatly expanded since the passage of the Vocational Education Act of 1963, it has become difficult for states to supervise all of their programs. The situation will continue to be complicated as further expansion takes place under authority of the Vocational Education Amendments of 1968.

In response to the growing need for trained persons at levels above the skilled worker, Title VIII of the National Defense Education Act of 1958 authorized programs for the training of highly skilled technicians. This further amplified the concerns of the AVA. Junior and Community Colleges began to accept more responsibility for vocational-technical education, but they were reluctant to welcome that same state supervision that secondary schools had been accustomed to over the many years. In some states separate boards for postsecondary institutions were established or utilized. These frequently requested State Boards for vocational education to fund new programs with no strings attached. However, State Boards for vocational education are the sole authority for the administration of these programs.

Understandably, therefore, the AVA was concerned about programs being conducted without meeting established standards. These programs might reflect on the ability of the Federal-State cooperative endeavor to meet the needs of youth and adults and of employers for the training of highly skilled technicians. At the same time, there was observed a proliferation of effort in accreditation by specialized agencies. This has continued to expand.

The first organized effort of this Association, about eight years ago, was to call together a group of educators from institutions which offered vocational-technical education in postsecondary programs. Also invited were representatives of specialized accrediting agencies. At that time it was suggested that the Board of Directors of the AVA request the American Council on Education to make a study of the nature and extent of vocational-technical education at the postsecondary level. Subsequently, the American Council employed Dr. Grant Venn to conduct such a study. His work resulted in the publication titled, Man, Education and Work.

The report of the panel of consultants appointed by the Secretary of HEW at the request of the President of the United States and the legislation which followed, the Vocational Education Act of 1963, gave further impetus to vocational-technical education at the postsecondary level. This, in fact, was one of the four purposes for which Federal funds could be expended. This statute also stimulated further development of the area vocational education school concept which originated with the National Defense Education Act. The area schools took several forms: 1) some were at the secondary level in which students from a number of high schools devoted part of a day, week or other period to vocational instruction in an area school; 2) some were strictly postsecondary in nature where all students who were admitted had completed high school; 3) some admitted both high school graduates and dropouts. This multiplication of programs at various levels created an awareness of the need for some appropriate accreditation of institutions and programs. This means that progessional criteria which are realistic in relation to the nature of vocational-technical education and its objectives must be developed and accepted by those associations and agencies which would accredit vocational and technical education.

The AVA has been asked by the regional associations and the National Commission on Accrediting to undertake the development of guidelines for criteria, standards and procedures for the accreditation of vocational-technical education. The AVA, strategically the professional vocational and technical educational organization with established and working relationships in all areas of vocational-technical education, has accepted this responsibility.

The AVA Board of Directors committed itself to the development of solutions to the problems which currently exist. In this connection, a proposal for research titled National Study for Accreditation of Vocational Technical Education was submitted to the U.S. Commissioner of Education for support through authorization of the Bureau of Research of that Office. This proposal was approved in June, 1969, and activity leading to its implementation commenced about November 1, 1969.

The following specific and immediate objectives are primary to this study.

1. To develop basic statements of criteria of common aspects of vocational and technical education programs at all levels and settings of instruction for purposes of accreditation.
2. To formulate an accreditation model for the use of accrediting organizations in program and institutional review and investigation.
3. To construct principles and guidelines of appraisal into a functional guide for use in self-study and self-evaluation as a most desirable and sustaining aspect of educational improvement which is a portion of the formal accrediting process, but not explicit to it.
4. To afford an opportunity to field test criteria and a functional accrediting procedure under actual professional operational settings and conditions with the cooperation of the accrediting community and school practitioners.
5. To establish a communication medium coordinated with periodic dissemination of interested professionals in agencies, organizations, business and industry, and the evaluation and accrediting community to implement voluntary staff self-appraisal and accreditation as vehicles to the on-going improvement and positive function of vocational and technical education in the lives of American youth and adults.

A system of accreditation which commands confidence will enable the nation to make more effective use of its resources in vocational-technical education. Without such a system, institutions with superior offerings often suffer because judgments regarding enrollment and support tend to be based on types or classes of institutions. A comprehensive program of accreditation will tend to drive poor programs and unscrupulous operations out of business or force desirable and necessary changes in their programs. Higher quality in both the proprietary and public sectors will result and the nation's skilled manpower will be increased.

Accreditation will facilitate the transfer of credit among vocational institutions and the awarding of credit for previous training. It will also serve employers who may have a knowledge of programs in their immediate area but who have no means of determining whether a prospective employee has been enrolled in a program of quality at a distant location.

The use of a common set of criteria, evaluation procedures and standards will produce wider understanding among vocational educators as to their role in American education. A consensus on objectives, purposes and methods will also result. It is hoped that the findings of this study may receive wide acceptance and use.

The first phase of this project was completed. It consisted of developing an acquaintance with persons prominent in the field of accreditation, the gathering of instruments currently being used for evaluation for all purposes, and reexamining the results of research studies, historic documents and other papers pertinent to the development of an understanding of the whole field of accreditation as it relates to vocational and technical education. The staff has acquired nearly 500 items of documentation in relation to this. In addition, Dr. Charles F. Ward of North Carolina State University has generously loaned the AVA the documentation which he acquired in the course of his study.

We have developed a statement of work activities and a time flow chart which serves to guide us as we move forward through the several steps which are called for in the project. The present step is the analysis of materials on hand, in order to develop some suggested standards which may be applied for evaluation of institutions and programs. Shortly to start and running concurrently are the development of criteria and procedures which will be useful in measuring the extent to which standards are met in the evaluative process. Models will be constructed following this activity and these will be field tested. Models will be adjusted and the results of these steps will be widely disseminated.

As an important part of our procedure in developing the several steps in this project, it is anticipated that the greatest possible involvement will be effected so as to include members of both the vocational-technical education and accreditation communities, as well as the concerned agencies, associations and institutions. Only by participation can it be hoped that acceptance may be gained of the product of this study.

As a result of study and conversations up to now, the staff prepared six guidelines for its own use in the conduct of the study. These are not at all intended to be used for program evaluation or for any aspect of the accreditation process, rather these are guidelines which will be posted throughout the office, to lead us to a successful conclusion. I should like to quote these:

1. Accreditation should promote accountability, and toward that end should be based on measurement of the product as well as the process.
2. Accreditation should encourage the collection of data about both process and product, and should encourage and provide assistance with research into the relationship between product success and process factors, thus utilizing the accreditation process to put the educational process itself on a more scientific footing.
3. Accreditation must continue to be in terms of the objectives of the institution or program; but those objectives should be so stated as to permit measurement of product success.
4. In line with item 3, objectives should be stated in such manner as to permit employers and other institutions to know what to expect of people who have completed any given program.
5. Accreditation should facilitate interchangeability of educational requirements, thus increasing freedom of movement up and between career ladders and eliminating any necessity to repeat education in order to advance in an occupational field or change fields.
6. Accreditation should be an educational process aimed at improvement of institutions and programs, as well as a means of identifying and certifying to the public those institutions and/or programs that meet minimum standards. Accreditation should be to an institution and/or program what education is to the individual.

The guidelines aim to reflect newest thinking in accrediting circles and to permit answers to criticisms such as:

1. Education is the only system that blames the product for its own failure. [Accountability]
2. Accreditation as presently practiced lacks validity and reliability. [Scientific basis]
3. Accreditation as presently practiced focuses on what may be irrelevancies. [False assumptions]
4. Accreditation tends to regiment, limit innovation, and institutionalize outmoded patterns. [Stagnancy]

At present we plan to call a small group of consultants to our Washington office for two days to review some materials now under preparation which will reflect our analysis of the kind of standards which are now in use by the several associations and agencies charged with the responsibility of accreditation. These we hope will be reconstructed so as to provide for improved validity, objectivity and reliability. We propose to discuss some brief statements of criteria which are suggestive of those which might be developed in more extensive detail and to prepare some statements of procedure which would be useful in the utilization of instruments growing out of this study. The work developed by these consultants will then be presented to the Steering Committee of this project at its next meeting in mid July. At that time we hope to obtain advice and suggestions by members of that Committee for the immediate next steps.

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The Continuing Need for Nongovernmental Accreditation

Frank G. Dickey
Executive Director
National Commission on Accrediting
June 12, 1970

An audience as knowledgeable as this needs little schooling in the importance of the concept of accountability as it applies to educational quality. We are all well aware of the need and the right of the public to know something of the quality of our educational programs and institutions. We are accustomed to the legislative and Congressional practices of checking to see whether or not state and federal funds are being wisely and prudently expended. The individuals attending this conference are acquainted with the fact that the United States has approached this business of assessing the quality of educational programs and institutions in a manner unlike that used in any other nation of the world, namely, through nongovernmental accreditation. Other countries have their ministries of education and they govern their institutions and regulate the quality of their schools on a national, governmental basis, but we, in the United States, largely because of the construction of our Constitution, have turned to a different means of assessing and regulating, to a degree, the quality of our educational institutions and the programs making up these institutions.

Because we have no central ministry of education in the United States, and therefore, have fifty different state approaches to education, the need has developed for identifying institutions which meet certain minimum standards of quality. This information is needed not only to enable students to transfer from one institution to another, but also to protect society as a whole.

While the role of the accrediting associations, whether they be general or specialized, is primarily that of maintaining and improving the quality of education, they do serve in another manner. I am speaking now of the place at which many legislators say, "They've quit preaching and gone to meddling," namely, in the area of protecting the freedom and integrity of the institutions of higher education. This is deemed necessary for the continuing quality of our institutions.

When we object to outside interference in the affairs of colleges or schools, we do not mean political interference only. Frequently, institutions are subjected to unusual or extraordinary pressures from local communities, citizens' groups, church groups, even professional organizations. All accrediting organizations will always be concerned when institutional integrity and academic freedom are threatened by forces originating from any of these sources. It should be pointed out, however, that we are not trying to stifle the normal criticism or pressures brought to our schools and colleges. Many groups and organizations have the responsibility to make themselves heard in the affairs of the institutions with which they are concerned. This is as it should be. Such pressures are expected and are healthy as long as they are within the group's or organization's jurisdiction and do not clash with the stated purposes of an institution. However, interference in the affairs of an institution from any of these sources is an entirely different matter, and interference should not be confused with the terms "normal interest or concern."

A few individuals, disenchanted with the inconsistencies, abuses, and problems of accreditation have suggested that we do away with accrediting. I must admit that I have been sorely tempted when the frustrations grow great to make a similar suggestion. But then, suddenly, one is brought up short, when one considers the alternatives. I say "alternatives," for we are deluding ourselves if we think for even one brief moment that a nation as sophisticated as ours is going to permit its vast educational system to operate without some form of assessment and evaluation. Before we speak of alternatives, however, let me indicate what I think is the proper relationship between the accrediting associations and the federal government.

The new realities of federal governmental participation in the development of the nation's system of post-secondary education demand new and realistic philosophical and psychological positions on the part of the accrediting organizations. Emerging from these stances will come new patterns of activity on the part of the accrediting bodies relative to the federal government.

The essential philosophical framework within which the associations might shape their relationships with the federal government could be characterized by the term "cooperative interaction." This term implies a recognition on our part that the federal government is now an indisputably dynamic participant in the process of shaping American higher education. It is recognized that since World War II the federal government -- primarily through the Department of Health, Education, and Welfare -- has expanded its support activities for education in an extraordinary fashion. Federal funding of education has become an integral part of our national social policy and, while this effort at the present time is largely on a programmatic basis insofar as the higher education segment is concerned, it may be reasonably expected that a federal "general support" funding program for higher education will materialize subsequent to the termination of the Vietnamese conflict.

I do not think we should view the federal government, in its expanding role of aiding higher education, as an antagonist, and I do not believe we should think of the federal agencies as an inherent or necessary threat to the autonomy of higher education. The history of the federal government's relationships to the various policy-formulating institutions of our society presents a pattern of enhanced federal power wherever these other societal institutions (state governments, etc.) fail to react in a responsible manner to contemporary social pressures. If the policy organs of American higher education fail to master the challenge confronting them, they must inevitably accept the federal government as the dominant formulator of educational policy.

By shaping its policies and procedures in such a way as to meet the reflected demands of our society, accrediting associations should anticipate a process of "cooperative interaction" between the organizations and the federal government. In pursuit of this statedphilosophy, I should propose that we exercise active, vigorous leadership within our corporate spheres of responsibilities -- and especially wherever our responsibilities and those of the federal government impinge. To that extent, compatible with the valid interests and claims of American higher education, the accrediting associations should function so as to inform, persuade, and enlighten the various agencies of the federal government regarding their perception of the best interests of the higher education community, and of society as a whole; the accrediting bodies should acquaint themselves with the federal policy-making process relative to higher education. Positively, the accrediting organizations should respond to the valid requests for action and leadership made upon them by the federal government. In so doing, the accrediting bodies might serve notice that they accept the federal government as a proper, creative participant in the effort toward elevating the quality of America's system of higher education -- and a partner whose interests it will respect.

Under competent and benevolent administrations such an approach might not be too objectionable, but under some administrations with their tendencies to load the offices with their own political cronies, I would have some real qualms. Furthermore, I have some grave doubts about the Constitutionality of a federal system of accreditation for the United States Constitution expressly leaves the matter of education untouched and consequently the entire jurisdiction of education becomes the responsibility of the fifty separate and sovereign states.

This then brings us to the second alternative -- state accreditation. There may be some amongst us today who would favor this approach, but I dare say that they take this position on the false assumption that all other states would accept their own state's particular accreditation decisions and would not question their authority. Once more, I think I have had just enough experience with state governments to be able to assure you that anyone who thinks fifty different systems of accrediting would not be pure chaos is living in a fool's paradise.

I have developed a new law which may not be the equivalent of Gresham's Law or Boyle's Law but I feel that it has considerable applicability today. That law is, "Stupid people make stupid decisions."

Obviously, I am trying to make a point that will justify the title of my remarks. There is a continuing need for nongovernmental accreditation and in spite of its present faults, abuses, and problems, it still represents the best and most efficient method we have for assessing the quality of education and thus indicating to all of those concerned with education -- the students, parents, citizens, legislators, foundations, and all other interested groups.

I believe in the concept of nongovernmental accreditation!

Having said this, however, let me say that I do not believe accreditation as currently operating is giving emphasis to the essential elements in our educational endeavors. Too frequently, in our attempt to conform to measurable "standards," we have given emphasis to the peripheral aspects of the institution and have missed the essential factors in an educational undertaking.

Two major elements should serve as the heart of real accreditation. The first of these is the teacher and the second is the manner in which the learning process is being carried on.

It seems to me that we have the capacity to determine the qualitative components in a teacher in spite of the difficulties such a task presents. Is all of our knowledge of human behavior and human predictability of no avail when we are faced with the most important use that could be made of it? Should we be content merely with the fulfillment of the technical requirements? Are we going to continue to count the number of Ph.D.'s as an indication of excellence in teaching? Could we not rather search in each institution for signs of great teaching, for proof that the interaction of teacher and student so essential to learning is actually taking place? Of much greater importance than the degree held would seem to be the methods by which an institution finds and selects its instructional staff and the faculty pattern it creates as a result of conscious efforts to build a great teaching center.

The second major concern of accreditation must be that of the learning process itself. Too many accrediting groups are concerning themselves with the number of courses given in a specific field. Would it not be more practical to place the accrediting emphasis on the evidence of creative teaching and the ability of the institution to turn out students who are intellectually curious and have a world-encompassing social consciousness for the rest of their lives?

Attention to these two essential emphases in accrediting will call for a change in both standards and procedures. We shall need to spend much more time visiting in the classroom than in conferences with committees. We shall need to visit more with students in their informal surroundings than in structured sessions planned by the institution itself. As anti-establishment as it may sound, would it not be more productive to eavesdrop on conversations of faculty than to weigh the poundage of their research papers?

Obviously, these suggestions would call for far more subjective judgments and might result in less satisfying or less conclusive results, but sometimes a little disorder can exert a benign influence.

Let me urge that we keep in mind the real purposes of accreditation and let us be certain that these purposes relate to the humane aspects of learning and not the mechanical trappings of the organization.

Let us center our attention on the teacher and what happens to the student, for they are the only real hope for educational advance.

My belief is that there is no agency or group better able to assist in upgrading the quality of our educational institutions and protecting the integrity of these colleges and universities than the accrediting associations. These are not agencies operated by one man, or by a small clique, or by one party or one denomination. They are large, broadly based operations depending upon the principles of self-regulation and self-control reflected through cooperatively devised standards arrived at by the consent of all the constituent organizations. These, I believe can be depended upon to preserve education as an essential force in a society of free man. Again, I remind you that these criteria are not the reflection of one institution which may occasionally go astray, but rather the combined thinking of all of our best institutions. When we can no longer depend upon the judgments and deliberations of the combination of our educational institutions, I fear that the end may be closer than we think.

With both public and independent school forces of every level joining hands, I believe that we can keep accrediting positive, constructive and socially useful -- that is, as long as we have the courage, the faith and the foresight to impose upon ourselves, upon our institutions, a real zeal for self-discipline and as long as we demonstrate a high devotion to quality in our educational programs.

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SPECIALIZED ACCREDITING AGENCY ACTIVITIES
in
OCCUPATIONAL EDUCATION

In keeping with the focus of this conference, this paper will be limited to a discussion of the role of specialized accreditation in public postsecondary occupational education. The term occupational education will be restricted to mean educational programs intended primarily to lead to employment. The credential awarded upon completion might be a certificate, diploma, or associate degree but in no case would the credential carry higher status than that normally assigned to the associate degree.

A brief overview of specialized accreditation activities in occupational education within the above limitations will be presented along with a rationale for this type of accreditation. This will be followed by a brief discussion of current problems and those which probably lie ahead. To illustrate, reference will be made to an impending study of accreditation for allied health education.

Jerry W. Miller, Associate Director
National Commission on Accrediting
given at
National Conference on Accreditation
of Public Postsecondary Occupational
Education
Atlanta, Georgia
June 10-12, 1970

Specialized Accreditation in Occupational Education

The National Commission on Accrediting recognizes agencies to accredit in five specialized fields at the associate degree level: The Council on Dental Education of the American Dental Association for programs in dental assisting, dental technology, and dental hygiene; Engineers' Council for Professional Development for two-year programs of engineering technology; and the National League for Nursing for technical nurse, or associate degree nursing programs.

The U. S. Commissioner of Education also awards recognition to accrediting agencies meeting certain criteria. Those recognized to accredit programs of occupational education in the public sector include the Council on Medical Education of the American Medical Association--programs in medical record technology and radiologic technology; the National League for Nursing and the National Association for Practical Nurse Education and Service, Inc.--practical nurse programs; the Accrediting Bureau for Medical Laboratory Schools--medical laboratory technician education; and the Council on Dental Education of the American Dental Association for programs in dental hygiene, dental assisting, and dental technology. All the above agencies except NAPNES, ECPD, and the Accrediting Bureau for Medical Laboratory Schools, have limited their activities to nonprofit education institutions. And in some cases, such as the ECPD, NAPNES, and the Accrediting Bureau, these agencies become institutional accrediting agencies when they accredit single purpose institutions.

(To keep the accreditation of occupational education in some perspective, it should be mentioned here that the U. S. Commissioner of Education recognizes the following as specialized accrediting agencies for private nonprofit and propietary occupational education institutions: the Accrediting Commission for Business Schools, the National Association of Trade and Technical Schools, the Cosmetology Accrediting Commission, and the National Home Study Council.)

The National Commission on Accrediting to this point in time has served a recognition function only for those agencies which accredit programs of an occupational type in junior and community colleges and technical institutes which are eligible for membership in the American Association of Junior.Colleges. On the other hand, the scope of recognition for agencies recognized by the U. S. Commissioner of Education is much broader. They may accredit programs in postsecondary institutions, including area vocational schools or industrial education centers not falling into the traditional collegiate institution category.

The Council on Medical Education of the American Medical Association does accredit other programs of an occupational nature in allied health education without the specific approval of the National Commission on Accrediting or the U. S. Office of Education. The Board of Commissioners of the National Commission deferred action on an AMA request for recognition in eleven new fields, mostly at the associate degree or lower levels, at its last annual meeting. The U. S. Office of Education has deferred also action on a request by AMA for recognition in several new fields. Both the U.S.O.E. and the National Commission deferred action in main because of the impending study of accreditation in allied health education, which will be mentioned in more detail later.

The Demand for Specialized Accreditation

All are familiar with the fact that in America we have generally adopted the concept of laissez-faire which opposes governmental interference in economic affairs beyond the minimum necessary for the maintenance of peace and property rights. That doctrine, adapted and restated, accurately conveys the feelings of most educational administrators relative to their institutions and accrediting agencies:

> As a group, Educational administrators in the United States favor evaluation of their institutions by outside agencies only to the extent necessary to maintain public confidence in the institution's quality and integrity.

This feeling derives from a basic belief in American education. This belief is well stated in the preamble to the Charter and Bylaws of the National Commission on Accrediting:

> The overall strength of the entire system of education derives in large part from the unique and diversified contributions of the individual institutions. This strength can be maintained and extended only if the institutions are free to experiment in the ways and means of education, and to determine their own objectives. They must be free to exercise both responsibility and authority in administering their programs.

It is obvious, however, that this freedom cannot be a blank check. The educational establishment 75 years ago came to the realization that some means of quality control in educational matters was essential for the general welfare of educational institutions. But that widely accepted principle by the membership of today's educational esablishment is about the only statement relative to accreditation with which someone or some group is not apt to take issue.

In the matters of who accredits what and for what purpose, the depth of evaluation, involvement in accreditation policy making, institutional prerogatives in the accreditation process, and the appropriate amount of muscle to be applied by accrediting agencies in seeking conformity to standards and procedures--these are the matters which generate a lot of conversation in accreditation. And it is this arena which gives rise to pressures for specialized accreditation.

In the main, we think of specialized or programmatic accreditation as being superimposed over the institutional accreditation process and as being a necessary addition in certain fields to help protect society from ill-prepared or incompetent practitioners. Some view specialized accreditation as unwarranted duplication, holding that the institutional process is adequate to assure quality in each educational program within an institution. Still others, hold the institutional process to be inadequate and argue for program-by-program approval. Particularly is this latter argument heard in some quarters in occupational education.

There are inherent and potential conflicts between specialized and institutional accreditation. The very need, as a matter of fact, for specialized accreditation says a great deal about the limitations of the institutional process. In complex institutions with a number of specialized programs, the institutional process is incapable of the in-depth evaluation necessary to assure society of competence in certain essential fields such as medicine, dentistry, law, engineering, etc.

It is in such fields that the education establishment has come to realize that a more narrow and in-depth professional focus and expertise is essential in the evaluation and accreditation process--a professional focus and expertise that is not organizationally possible in an agency faced with the awesome responsibility of accrediting institutions ranging from technical institutes to liberal arts colleges to hugh institutions with a primary emphasis on research and graduate education.

Potential conflicts between specialized and institutional accreditation will always exist. Specialized agencies are prone to stray over into areas which are properly the concern of institution-wide policy and great care must always be taken not to create conflicts in the application of varying sets of standards to the same institution.

But this potential for conflict in no way negates the need for both the institutional and specialized approaches to accreditation. The policy statement of the Federation of Regional Accrediting Commissionsof Higher Education, while making an attempt to distinguish between objectives and purposes of intitutional accreditation v. specialized accreditation, gives recognition to this important point:

> "...general accreditation of the institution as a whole is not and should not be interpreted as being equivalent to specialized accreditation of each of the several parts or programs of the institution."

Later, the statement amplified the point in this manner:

> Institutions must not "...interpret...general accreditation as validating a specialized program in the same manner and to the same extent as specialized accreditation."

The Federation statement gives recognition to the social need for both institutional and specialized accreditation.

On the other hand, social good is not always served by specialized accreditation and it was the recognition of this fact that led to the creation of the National Commission on Accrediting more than 20 years ago. Essentially, it is the role of the National Commission to make decisions relative to accreditation which blance the need for professional and specialized accreditation with that of the general welfare of educational institutions. The larger context in which these decisions are made is that of social good.

The National Commission is supportive of institutional accreditation and holds that wherever social need does not otherwise dictate, institutional accreditation is adequate for the educational quality assurance needs of society.

Factors other than the inherent limitations of the institutional accrediting process create pressures for institutions to submit specific programs and curricula to the scrutiny of external agencies. These fall into three categories.

Professional Concern. This factor has been a prime mover in nearly every specialized accreditation movement. William K. Selden, former director of the National Commission, has written:

> When individuals in a particular group discover that they are using a common body of knowledge which has been developed and is identifiable and communicable through an intellectual process of higher education, inevitably they band together to form a professional association. Not only do they aim to create an organization which will foster research, advance learning in the profession, and improve service to the public, but they develop an impelling motive to raise individual status by restricting admission to the profession--sometimes with more emphasis on the interests of the practitioners than on the public welfare.

Frank G. Dickey, Executive Director of the National Commission, speaking to this point at the 66th Annual Congress on Medical Education, said:

> A profession has a social responsibility to assure society that its present and future membership will be adequately educated and prepared to assume those responsibilities which society expects of the profession.
>
> It should also be noted that members of a profession have a social, monetary, and professional concern that their individual status will not be adversely affected or undermined by the intrusion of incompetent practitioners. This concern has been likened on occasion to a property right.
>
> One of the problems in accrediting today is that this second motivating factor for accrediting, as important as it may be, has from time to time outweighed the social responsibilities in the accrediting standards and procedures.

An extension of this professional interest--and one which has far-reaching implications for the subject of this conference--is becoming increasingly evident. The professions for various reasons are becoming intensely interested in the education of the technologists or technicians (by whatever name) who work under their direction or in an allied field.

Charles Ward's survey of accrediting agencies revealed a considerable body of interest on the part of established professional associations, already in the accrediting business, which are actively interested in affecting quality in the education of technologists and/or technicians in their fields. At least one, the American Institute of Architects, has developed a "certification" system for two-year architectural technician programs.

The pressures--and they can be substantial--will, no doubt, continue to grow in view of the rapid growth of technical education programs. The argument for specialized accreditation by professional societies in the technical fields will take a simple and forceful tack: "The institutional accreditation process," the proponents will argue, "is not adequate to assure well trained technologists or technicians for our field; therefore, we must begin an accreditation program."

Status Seeking. This pressure might be defined as the socially undesirable manifestations of "professional concern." Bill Selden pointed out in the principle he enunciated that: first, specialized occupations tend to band together in associations; second, they plan ways to restrict admission, and third, they seek to implement these restrictions through certification, licensure, or by requiring graduation from an accredited educational program or apprenticeship program--programs controlled by the affected group, of course.

This pressure also tends to create conflict within educational institutions. Those directly responsible for the education program desire to teach or administer a program which meets special standards. It gives them additionalstatus within their institution and marks them as educators in a specialized field. This puts them in opposition, often, with the chief administrator of the institution who seeks to limit such activities.

The stories are plentiful about the president who vociferiously opposed accreditation in a specialized field only to learn that his own dean or department head was a national leader in the movement. Messersmith and Medsker, in their study of Accreditation of Vocational-Technical Curricula in Postsecondary Institutions, documented the fact that a much higher percentage of faculty and department chairmen favored specialized accreditation than did deans and presidents.

The history of accreditation to date indicates that the specialized interests, whether they be in the form of professional concern or in the form of status seeking, win out over a period of time.

Licensure, Certification, or Registration. A clear picture as to the relationship of accreditation to licensure, certification, and registration is not available. Neither are the trends in such practices readily apparent. But it is apparent that licensure for occupations is increasing at a rapid rate.

A United States Department of Labor Manpower Research Monograph, published in 1969, reports that licensure laws have doubled in the last quarter century. A review of the state codes for 1968-60 showed almost 2,800 statutory provisions requiring occupational licenses. Some at least, require graduation from an accredited program in order to be eligible to sit for the licensure examination.

(A December 1969 decision by the Appellate Court of Illinois has called into question the practice of requiring graduation from a program accredited by a nongovernmental agency in order to be eligible to sit for a licensure examination. The court held that such a practice was an invalid delegation of power by a state licensure authority.)

Given the rapid increase in licensure statutes and the ability of occupational groups to obtain favorable legislation from state legislatures, it is highly likely that licensure provisions will create new pressures for specialized accreditation. And the fact that the certification or registration practices of professional societies and occupational specialties will continue to generate pressures for specialized accreditation seems to be indisputable.

The Path Ahead

It seems reasonably clear that the pressures for specialized accreditation to be superimposed over institutional accreditation in a large number of fields will continue unabated. That many new agencies will achieve recognition for specialized and professional accreditation, many at the associate degree occupational level, seems probable within the context of intensified occupational specialization.

All of this probably will happen despite the cries of educational administrators over the rising costs of accreditation and the rising demands made on their institutions by outside agencies. The Herculean task of beefing up the institutional process to the point where it can significantly relieve pressures for specialized accreditation seems improbable.

It is highly likely that the accreditation hierarchy is about to experience a significant crunch--something will give and some modifications will be made. Institutional and specialized accreditation will survive and remain as vitally necessary as ever, but both may take slightly different twists.

Few would venture a guess as to what these new twists might be. It might prove useful, however, to take a brief look at the impending study of accreditation of selected health educational programs. Hopefully, this study can be launched within the next few weeks.

The study should be of particular interest to this conference because it is in the allied health area that specialized accreditation is proliferating at its most rapid rate, and it is in this field that the majority of the programs are now falling into the occupational education area.

The Council on Medical Education of the Ameircan Medical Association, in collaboration with a number of professional and speciality groups, now accredits 15 separate programs in allied health education with 15 separate sets of essentials. A campus having all 15 programs would be required to host 15 different accrediting teams and pay 15 different accreditation fees. No special criticism is meant here by singling out the AMA; rather, the AMA program is cited as an example of what is happening and can be expected to happen in an accelerating fashion in other fields unless new approaches are found.

One possibility of the allied health study is that it will point to the need for a "cluster" approach to specialized accreditation in certain fields, thereby providing the protection society needs relative to practitioners and easing the rapidly growing burden which institutions are having to assume in support of the accreditation process. Whether any such approach will prove feasible and acceptable to the myriad of interests in allied health remains to be seen. It does seem certain that some new approach will be required to keep accreditation from falling under its own ponderous weight.

It would seem that institutional accreditation also is obligated to make its procedures more relevant and more acceptable for occupational education which does not require specialized accreditation. Institutional accrediting agencies must realize that through years of neglect of vocational-technical education they have created a credibility gap with many occupational educators. Despite a great deal of fanfare in recent months, many occupational educators are not yet convinced that the regional associations are serious about providing accreditation for vocational-technical education programs.

Increasing the number of occupational educators on visiting teams, policy-making committees, executive councils, and commissions can help alleviate these fears and, in turn, greatly reduce pressures for specialized, programmatic or categorical accreditation for this field of education.

By making some rapid but well considered adjustments, we can retain the social utility of both specialized and institutional accreditation and ease the accreditation burden for institutions.

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ACCREDITATION OF POSTSECONDARY OCCUPATIONAL EDUCATION IN PERSPECTIVE: ISSUES AND ALTERNATIVES

A Paper Prepared by

William K. Selden

Former Executive Secretary
National Commission on Accrediting

And Presented to

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Introduction

The title, which was assigned to me for my formal contribution at this conference, reminds me of the announcement included in a church bulletin: "This morning there will be a meeting in the north and south ends of the church. Children will be baptized at both ends."

I am expected to speak about accreditation of postsecondary occupational education in perspective: issues and alternatives. To me this means that I am to baptize you at both ends: the past and the future.

Although there can be differences of interpretation with respect to the past, there will likely be little controversy among those assembled here with respect to the historical developments of accreditation. However, at the other end - the future - there are bound to be differences, strong differences, if for no other reason than that you collectively represent a wide divergence of special interests, organizations and points of view.

In an attempt to be of assistance let me present my observations with respect to the purposes of accreditation both in the past and in the present, and conclude with some observations and predications for the future.

The Past

As all of you know and as Charles F. Ward has so clearly reminded us in his excellent current survey of accreditation and evaluation of postsecondary occupational education, there are three general types of accrediting organizations. These are the regional associations of educational institutions - colleges, universities, and schools - which accredit themselves; the national professional bodies which accredit the programs of study educating and preparing future members of the respective professions; and governmental authorities in some of the states which conduct accreditation - whether it is termed approval, licensing, registering or accreditation - of institutions and/or programs of study. The original purposes of accreditation were not identical for these three general types of organizations.

Original Purposes of Accreditation by Regional Associations

The single most important reason for the founding of the earliest regional associations of colleges and secondary schools was the need to improve the means by which students were admitted from the schools to the colleges, what we now identify as articulation. Colleges were testing students on the basis of different syllabi, a condition which was painful for the teachers and the pupils, especially in a school which might send its graduates to more than one college. Furthermore, some colleges were operating at a level little more than that of a secondary school, and many more colleges were conducting education at both the collegiate and secondary levels.

Following the Jacksonian period and the Civil War and in a period of economic and industrial expansion, education gradually disengaged itself from what we now consider to be the classical tradition. The land grant colleges were increased in number, graduate education was superimposed on the colleges, new fields of study were introduced, and the old criteria of what comprised a good education became untenable. Changes in education were being introduced, although at a much slower pace than we are currently experiencing. The result was a chaotic situation with varying attempts at regularization and standardization.

These attempts included a system of certifying high schools developed by the University of Michigan, the creation of the now defunct New England College Entrance Certificate Board and the still very active College Entrance Examination Board, as well as the Carnegie unit which was devised to serve a very definite need. When the need no longer continued, the concept of the Carnegie unit persisted and thus in time it became much maligned. During this same period four of the present six regional associations were formed in New England, the North Central, the Middle Atlantic and the Southern States.

Concerned with articulation between the schools and the colleges these regional associations were inevitably and immediately involved in issues relating to standardization, standardization of both the institutions and their educational offerings. Accreditation became the primary process by which standardization was enforced. Incidentally this movement was not limited to education; it extended into business, finance, labor, agriculture and throughout society. In 1907 Woodrow Wilson stated:

> We are on the eve of a period of reconstruction. We are on the eve of a period when we are going to set up standards. We are on the eve of a period of synthesis, when, tired of this dispersion and standardless analysis, we are coming to put things together into something like a connected and thought-out scheme of endeavor. It is inevitable . . .

Within this context the regional associations set up standards and expected the institutions to comply with them in order to attain accreditation.

As with the Carnegie unit when it passed its period of usefulness, standardization of education as required for accreditation continued beyond its period of constructive contribution.

Resistance to the approach of standardization led to a massive study by the North Central Association in the 1930's, and to the philosophy devised by the Middle States Association in the late 1940's of judging institutions individually in the light of their stated goals. This change was in response to changing philosophies and to the fact that some regional associations were beginning to review for the first time those members which had been permitted to retain their accredited status as long as thirty years without review. "Once in the club, always in the club," was the observation of some educators. The institutions which controlled these associations wished freedom to conduct their own educational affairs as they chose. The philosophy "in the light of their stated goals," appealed to them. We have since learned that this philosophy of accreditation can sometimes be carried to a point of little meaning.

Another factor, often overlooked, which supported more introduction of accreditation was the desire of some of the stronger institutions to have a means of publicly segregating themselves from other institutions which they considered to be inferior and which in some cases were pursuing shoddy or even dishonest practices. This factor has provided a motivation for many institutions to seek the status of accreditation.

Original Purposes of Accreditation by Professional Associations

In a similar manner this same factor of public identification has provided one of the motivations for members of national professional bodies to support the activities of their societies in accrediting programs of study which prepare the future members of their particular professions. The accomplished professional does not wish either to be associated with or to face undue competition from an unqualified practitioner. One of the ways to protect himself is to support a program of accreditation in which only the minimally adequate educational offerings are given public recognition and approval by his professional body which, in his view, comprises the only individuals who are capable of judging an adequate educational program for his profession.

The first professional field to undertake accreditation was medicine. Although organized in 1847 the American Medical Association did not publish its first list of approved medical schools until 1906-07. The delay was caused to a large extent by a continued acceptance of the philosophy of laissez-faire and by opposition on the part of many physicians who feared that their own professional competence and educational background would be questioned if the schools where they might have studied were not on the approved list. Publicity following the issuance of the Flexner Report in 1910 accelerated the establishment and enforcement of standards in medical education and the eventual closing of approximately half of the more than 160 medical schools which were in operation in 1906.

From this beginning accreditation of professional programs of study conducted largely by the national societies representing the professional practitioners has multipled so that today there are several dozen such accrediting organizations, and the number is bound to increase. But more about this later. For the present let me simply recognize that the primary purposes for accreditation of professional fields of study were to help the public identify minimally qualified practitioners by standardizing their education above a minimum level and to protect the practitioners from the competition of incompetent persons.

Purposes of Accreditation by State Agencies

Under whatever terminology it may operate, accreditation is also conducted by a few states, but in no consistent manner. Most states perform either no accreditation or only limited accreditation of educational institutions, public or private. At the other extreme is New York State with its long established Board of Regents which possesses broad powers; it may even suspend the charter of any educational institution if in its judgment an institution fails to comply with the state regulations. Regardless of the extent to which the state exercises its responsibilities, each state is assigned through the adoption of the Tenth Amendment to the United States Constitution the privilege of regulating and controlling the education offered within its state borders. Such control is intended to be exercised only for the public welfare, in contrast to accreditation by regional and professional organizations which do operate in part for the benefit of their members.

The Present

Although this is a somewhat cursory sketch of a few of the factors related to the history of accreditation, I have presented this sketch in order to emphasize the purposes which accreditation was originally expected to fulfill. Before speculating about the future let us consider what are its present purposes.

No longer is articulation, or admission from school to college, or college to graduate or professional school, an important purpose of accreditation. Other criteria, such as testing, both objective and subjective, have been developed to preclude the necessity of relying to any great extent on accreditation in admission of students.

In addition standardization is not at present an important purpose of accreditation. In fact, it is not standardization but more flexibility which is needed in education; and there are serious questions about whether accreditation may actually hinder to some extent or at least be used as an excuse for not devising more flexible patterns of education at all levels.

The three purposes for accreditation which I consider to be of current, primary importance are: (1) identifying institutions or programs of study which have attained minimum quality; (2) serving as a complimentary function to licensure; and (3) continuing to provide some protection to institutions of reasonable quality from improper competition on the part of institutions of a shoddy or dishonest nature, and protection from inappropriate intrusions by external forces, such as public officials, politicians, and either extreme right or left wing groups attempting to disorient an institution.

There are other functions of accreditation which some persons would consider to be among its purposes, such as stimulating continued improvement. This operation I consider to be an incidental by-product which could be, and is, by other organizations and conducted in other operations just as well, and is not primarily a function of accreditation.

Of these three present purposes of accreditation, the one which is over-riding in importance is that of identifying institutions or programs of study which have attained at least minimum quality. For this purpose alone accreditation should be supported, at least until some other equally good or better method is developed. Not merely do students, parents, employers, guidance counselors, and prospective donors rely initially on the lists of accredited institutions and programs of study, but agencies of the federal and state governments increasingly are dependent on such lists.

In this country we have no tradition of, or apparent desire for, a ministry of education or a ministry of finance to issue directives or sets of standards by which educational institutions are expected to operate. Instead we have developed, as has no other country, the art or science, as you prefer, of objective testing and employ this method of evaluation quite widely. However, we have not yet considered such testing to be sufficiently infallible that we can rely on its results for a total classification of institutions or programs of study, which classification could be considered reasonably accurate and significant.

In view of these factors, in view of the size of this country and its diversity, as well as the diversity among the types of institutions, and in view of our national reliance on education for a massive proportion of our large population, I predict that we will continue to rely on accreditation in some form as a means of initially identifying institutions and programs of study which maintain reasonable quality. You will note that I stated, in some form. Exactly what the form will take I cannot predict, but I can restate my previously expressed opinion that accreditation will shortly have to go through some major transformations in order to meet the needs of society.

Charles F. Ward has indicated this trend when he identified eight factors which complicate accreditation of occupational education:

1 - failure to determine whether program accreditation, institutional accreditation, or both are at issue;

2 - inability to determine what vocational-technical education includes;

3 - diversity related to the fact that some occupational education programs are part of the comprehensive high school, separate institutes, or the community college program and are supported publicly, privately, or by a variety of proprietary institutions;

4 - recognition that accreditation in America has historically been a voluntary and jealously guarded relationship between an institution and an accrediting agency, which, in the minds of many, is threatened by the involvement of governmental agencies;

5 - allegations that federal funding threatens the traditional freedom of institutions;

6 - unresolved issues of creating fifty state accrediting systems or maintaining existing regional accrediting;

7 - confusion regarding program approval versus institutional approval;

8 - indecision regarding development of additional accrediting agencies or expansion of existing ones to cope with specialized educational programs; and

9 - disagreement on accrediting programs at the two year level.

Dr. Ward's list of factors which complicate the accreditation of occupational education, raises a number of issues extending beyond the development and place of such accreditation. They also remind me of the difficulties and protracted delays faced by teachers colleges and junior colleges in their early attempts to gain recognition and accreditation from the liberal arts oriented and dominated regional associations. However, conditions have changed in the past fifty years and occupational education will gain acceptance much quicker than, for example, those early junior colleges, which, incidentally, were initially considered to be half a liberal arts college for purposes of accreditation.

Acceptance of occupational education will come much more quickly because, for one thing, the federal funding of such education is now approaching a billion dollars a year. In the second place, although not yet sufficiently recognized generally by educators, the primary purpose of accreditation currently is to serve the needs of society; and one of these major needs is to screen institutions and programs of study for government agencies making grants for educational purposes.

On these premises and with this background I offer some conjectures for the future.

The Future

It is a reasonably safe prediction that the federal government will in the future be more prominent in accreditation than it has been in the past. I am not implying that government agencies will themselves conduct accreditation; I am indicating that they will exert more influence in the philosophy, the structure and the process.

You will recall that the Veterans' Readjustment Assistance Act of 1952 charged the United States Commissioner of Education with the responsibility of publishing "a list of nationally recognized accrediting agencies and associations which he determines to be reliable authority as to the quality of training offered by an educational institution." To fulfill this assignment the Office of Education established criteria or standards which accrediting agencies were required to meet in order that their respective lists of accredited institutions might be accepted. The enforcement of these criteria for accrediting agencies was far from severe until the past few years when the Accreditation and Institutional Eligibility Staff was created in the U. S. Office of Education. With the assistance of an Advisory Committee this Staff is placing appropriate emphasis on the needs of society as it reviews accrediting agencies for initial recognition or renewed recognition.

Concurrent with these developments all accrediting agencies are finding that their present sources of funds are insufficient for them to meet not only their present obligations but the added responsibilities expected of them. (Parenthetically, the costs of the Marjorie Webster

Junior College case are placing a large financial burden on the Middle States Association of Colleges and Secondary Schools.) The accrediting agencies are being subjected simultaneously to criticisms from their members for increased assessments and dues for accreditation and from non-members for not thoroughly testing and validating the criteria by which they conduct their accrediting procedures.

In view of these and other factors I visualize that in the future the federal government, possibly through the Accreditation and Eligibility Staff, will be contracting with selected non-governmental organizations to perform the functions of accreditation, the results of which will meet the governmental needs of identifying institutions and programs of study of reasonable quality. If this source of additional financing for the financially hard pressed accrediting agencies develops I further predict that as part of the contract to receive funds these organizations will be expected to adopt policies which will cause them to revise and broaden their philosophies, review their criteria in a more scientific manner, and alter their structures.

Philosophies of Accrediting Agencies

Because of their origins and because of their historical developments accrediting agencies representing either institutions or programs of study have naturally developed philosophies that are congenial to their respective constituencies. The general public has not been one of their constituencies and, therefore, the interests of the public have been no more than of secondary importance. Examples of this fact can be demonstrated by the following questions.

> Is the quality of the education offered by an institution related to whether the institution grants a bachelor's degree, or any degree?
>
> Has it been proven that the quality of education is directly influenced by the method in which the institution is financed; that is, by non-profit orientation or profit incentives?
>
> What is the social justification for granting accredited status to programs of study offered in some types of institutions but refusing to grant such recognition to similar programs in other types of institutions?
>
> What is the social justification for institutions in some regions of the country being eligible for accreditation and the same types of institutions in other regions being considered ineligible?
>
> Does accreditation of an institution guarantee that all of its programs of study are operated above a minimum level?

Other questions could also be presented, but these are sufficient to indicate that changes in philosophy must be introduced and adopted if the accrediting agencies are to meet more adequately the needs of society. Furthermore, this last question aims at the heart of one of the conflicts between organizations which accredit institutions and those which accredit programs of study.

Criteria Employed by Accrediting Agencies

With all of the money and effort expended in the development of tests and their applications and with all of the studies and scientific research sponsored in this country, especially by educational institutions, it is noteworthy that our accrediting agencies have encouraged such little analysis of the effectiveness of their activities and the validity of their criteria. There has been only one extensive study of accrediting criteria and evaluation with which I am familiar; namely, the study sponsored in the early 1930's by the North Central Association of Colleges and Secondary Schools, the results of which had little apparent effect on the conduct of accreditation.

As accrediting agencies are required to given primary attention in their accreditation to the needs of society, they will be forced to justify the validity of their own criteria. No longer will the public accept the development of requirements for accreditation only by those who are most directly concerned with the results; that is, the officials of the institutions or programs of study under review.

This observation leads to the issue of structure about which I anticipate there will be strong differences of opinion because, as I stated at the beginning of this paper, you represent varying points of view and different organizations with varying interests.

Structure of Accreditation

At the center of all issues in accreditation is the conflict over structure or control. The genesis of the National Commission on Accrediting was the issue of control, or as I have written, a struggle over standards.

The institutions, especially the liberal arts colleges and universities, and now the junior colleges, wish to control the regional accrediting associations through their administrative officials. The members of the professional societies wish to control the accreditation of the programs which prepare the future members of the respective professions. And it must be noted that the number of such specialized groups wishing to perform accrediting functions is rapidly increasing and will continue to do so for many social reasons which would cause distraction if they were enumerated at this time.

In all of these examples where is the public represented? Let us take the regional associations as an example. It would be interesting to make an analysis of the composition of the boards of directors or executive boards and of the commissions responsible for the accreditation of post-secondary institutions. I anticipate that the results would show that the total composition is, with a few exceptions, white, middle aged or older males who are presidents or serving in other administrative positions of colleges or universities, with a sprinkling of some secondary school administrators.

If this assumption is reasonably accurate, can one expect that occupational education be accepted and evaluated with judgment by the regional associations in a manner, adequate to meet the needs of society? The history of these associations would indicate a lack of recognition of the broad concepts of social responsibility, in contrast to concerns for the institutions which already are members.

On the other hand, does this mean another national organization to accredit specialized fields of study, an organization whose control would be in the hands of educators concerned only with occupational education? The welfare of society would argue against this development if for no other reason than it would add further to the already excessive fragmentation of educational organizations.

Theoretically at least the regional associations have it within their power to take the lead in resolving the issues which Dr. Ward listed as complicating the accreditation of occupational education. However, they are unlikely to bring a constructive resolution to the scene without a drastic change in their structure and basis of control. To accomplish this major revision they will need further nudging by such groups as the Accreditation and Eligibility Staff of the United States Office of Education and the National Commission on Accrediting. They also will need simultaneously to realign their geographical boundaries in order to provide for more effective administration.

If such changes are not initiated in the near future we could witness the Accreditation and Eligibility Staff turning for accrediting services to some newer organization, such as the Education Commission of the States. Such a move should not be considered revolutionary since under the United States Constitution the legal authority to regulate education rests with the states. There can be no doubt of the primary obligation of the states to consider the public welfare.

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THE COMMUNITY JUNIOR COLLEGE
APPROACH TO SPECIALIZED PROGRAM ACCREDITATION

NATIONAL CONFERENCE ON ACCREDITATION

Atlanta, Georgia

June 10, 1970

K. G. Skaggs

American Association of Junior Colleges

My assignment to discuss with you matters of specialized accreditation in the field of occupational education has posed a rather difficult task for me. In the first place, whatever one days concerning any kind of evaluation or procedure for accreditation of programs or personnel in any educational field can very possibly become suspect of bias. With the very rapid growth of the many occupational or career programs in post-secondary institutions in this country during the past ten years, the whole problem of specialized program accreditation has mounted an increasing concern for better and more effective ways of evaluating and judging the educational institutions' work. Another reason for difficulty in discussing with you this whole matter lies in the present fluidity of the whole problem -- positions and points of view are changing so rapidly that what I am indicating to you today may not be really as true tomorrow.

My presentation today will center most directly on the area of accreditation. The multi-faceted issues of licensure and registry, especially as these relate to allied health programs, is another concern altogether. I think we should realize that we are really talking about three different areas of concern. Accreditation for the most part focuses on the program and its institutional setting. Licensure and registry focus upon the competency and the ability of the individual coming out of a program and an institution to perform the tasks for which he has been prepared in the educational program. Licensure, again, is generally a responsibility of the individual state. The prospective worker must pass licensure examinations and must be tested in his competency and skills. Generally, again, registry is the responsibility of professional groups representing the various occupations and representing the employers of personnel, and registry of the individual usually confirms that the program in which he received his education and preparation for work should enable him to perform competently and well. Examinations and tests are usually a part of registry also.

Requirements for registry differ from one professional group which administers the registry to another. Requirements for licensure, even for individuals in the same occupation, may differ from state to state. For information concerning the exact procedures and the requirements for licensure, you should communicate with the state board for the occupation in your state; and for registry you should communicate with the national office of the professional organization registry.

The concerns of accreditation, therefore,will be the emphasis of our presentation today. Accreditation has long been a part of the educational process and the principle of accreditation was developed by educational institutions themselves. In the old Elizabethan language, we in the educational institutions, with the increasing proliferation of accreditation demands and the inconsistency developed in procedures, find ourselves "hoist with our own petard." Accreditation, of course, is simply another way of saying that we are pronouncing judgment on the effectiveness and the quality of courses and programs and the product which comes from them. As the demands of special accreditation have grown, educational institutions are becoming increasingly restless and hostile to the current methods, approaches, and procedures. Almost all of our educational institutions are subject to regional accreditation from their regional accrediting associations.

Many feel that additional specific program accreditation is duplicative, costly in terms of money, time, and effort, and because subject accreditation is largely based on a set of principles quantitative in nature, is not really exercising very valid judgment. In other words, educational institutions are questioning very seriously not only the necessity of program accreditation as it is now administered, but are questioning even more sharply its cost, its approach, and its basic principles.

Our particular interest is in the field of occupational education and trining programs in our community junior colleges. The matter of accreditation of such programs becomes somewhat complex and certainly mor e important because the degree of competency and the ability of the worker coming out of our programs to perform and to exercise effectively and well his direct functions and skills reflects directly on the community college and its standing in the community.

I am perfectly aware, since I have had some role to play in its formation, of the resolution officially approved by the Board of Directors of the American Association of Junior Colleges on January 4, 1967. The resolution in its entirety reads as follows:

> The Board of Directors of AAJC reiterates its position statement of August 26, 1964, to the effect that "regional accrediting associations should bear the primary responsibility for accreditation of community and junior colleges. These regional associations should examine and reformulate where necessary their procedures and policies so that they can evaluate total programs of community junior colleges."

> AAJC fully supports the policy statement forwarded on November 17, 1966, from the National Commission on Accrediting office which emphasizes the central, important role of the regional associations.
>
> Further, AAJC offers its full cooperation in assisting professional agencies and the regional associations in their respective and combined efforts to assist community and junior colleges to strengthen and maintain the high quality of curricular programs.
>
> The Board expresses its appreciation to the NCA for its effective efforts for the improvement of junior and community college accreditation procedures and policies and for its work on behalf of all education.

I think one point should be made very clear. Nowhere in the resolution is there a denial of the importance of accreditation, or even of program accreditation. The focus of attention is upon the method and the procedure for evaluating programs and their product. It should be pointed out that the strongest justification for the accreditation of programs is the protection of the employer and the product or service with which he deals.

As we turn to a more specific discussion of some of the current trends in the accreditation process, I would call your attention to several of the professional groups that are attempting to bring a unity and a consistent procedure to the accreditation of programs. The American Medical Association is one; the American Dental Association is another; the modifications made by the National League for Nurses in their original procedures and methods of accreditation is a third. Others are in the areas of engineering and science, such as EPDA, or in commerce and business. Of course there are many agencies and professional groups representing specific programs

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that are not all related to these larger professional organizations. As an example of some of the current trends in accreditation, let me use the American Medical Association as an illustration. Again I would like to precede this by repeating the justification for accreditation; in these areas of health and medicine education programs, the physicians need to be very sure that allied health workers have the education necessary to prepare them to accept the increasing tasks being delegated by physicians to them.

In addition to four baccalaureate programs (for medical record librarian, medical technologist, occupational therapist, and physical therapist), physicians have been concerned with sub-baccalaureate educational programs for decades. At the request of the others concerned, the American Medical Association House of Delegates has adopted Essentials for sub-baccalaureate educational programs for nine allied health occupations: radiologic technologist, medical record technician, inhalation therapy technician, cytotechnologist, certified laboratory assistant, radiation therapy technician, nuclear medicine technician, medical assistant, orthopedic assistant. A request for National Commission on Accrediting and Office of Education recognition of the accreditation for baccalaureate level educational programs for the nuclear medicine technologist is pending. Essentials for the histologic technician are now before the AMA House of Delegates.

The AMA Council on Medical Education is accrediting a significant number of educational programs at the sub-baccalaureate level in educational institutions. At their March meeting in Seattle, the Council on Medical Education accredited sub-baccalaureate programs in junior colleges and lower divisions of colleges and universities for the following fields: certified laboratory assistant, cytotechnologist, medical record technician, radiologic technologist. Total accredited in March, 1970: 15 programs. The Council's Directory of Accredited Programs includes the following sub-baccalaureate programs in educational institutions as of September, 1969: certified laboratory assistant, 52; cytotechnologist, 5; inhalation therapy technician, 28; medical record technician, 13; radiologic technologist, 401.

Junior colleges which request accreditation are being surveyed and accredited.

1. In September, 1969, the AMA Council on Medical Education adopted a formal statement to reaffirm its support for junior college programs in allied health and the Council's willingness to accredit such programs.
2. Routine AMA staff work includes serving on survey teams to review junior college programs for the medical record technician. All but two of the programs accredited by the Council on Medical Education for MRT are in community/junior colleges or technical schools.
3. The newly adopted Essentials for medical assistants is concerned solely with junior college (or lower division college) programs, and all schools accredited to date are in junior colleges.
4. The Essentials for the certified laboratory assistant include this statement: "Acceptable schools for training certified laboratory assistants may be conducted by approved medical

schools, hospitals, acceptable laboratories, junior or community colleges, and technical-vocational schools suitably organized in accordance with present educational standards."

5. Inhalation therapy survey procedures have been reorganized primarily to meet the demand by junior colleges that their inhalation therapy programs be accredited.
6. New Essentials currently being drafted are primarily concerned with junior colleges (or lower division colleges) programs.

A new standard format for AMA Essentials has been sdopted as a guide in revising all existing Essentials as well as drafting new Essentials. The standard format specifies that junior colleges be listed as acceptable for sub-baccalaureate educational programs.

Most of the educational programs for allied medical occupations are in hospitals rather than in colleges and universities.

It is planned that the second edition of the Directorywill include the Essentials, lists for each of the occupations, and the annual report, as well as the consolidated list of all AMA approved allied health educational programs in each institution.

Here is the way in which one professional organization is moving. Quite recently I met with a small group of people from the American Medical Association, the National Commission on Accrediting, and the U.S. Office of Education to discuss the issues and concerns of accreditation in the allied health field. This group, discussing informally the problems that so concern us with accreditation, proved to be a perceptive and far-seeing committee. I would hope that you in this audience, concerned as you are with the accreditation process and procedures for occupational education programs, will give the same depth of attention and concern to accreditation as it affects your institutions as did this committee as it looked at these problems generally.

As a kind of summary of this brief presentation to you, I would like to present to you some ideas that I hope will stimulate you in your own thinking and will be helpful to you in understanding the total process of accreditation. I know that you are aware that I have identified some problems and issues, but have done nothing to give you resolutions to them. I cannot myself provide the answers to these problems. I may even have made more obscure some of the bases for consideration and thought. Hopefully, I have brought you some information and some clarification. With these preliminary statements, let me make now my comments for your own thinking.

Some kind of program evaluation and judgement of quality is going to be needed concerning occupational education programs. The professional and employer leadership in career education is not going to abbrogate what it considers to be its prime responsibility in exercising quality judgment on the people who will be a part of the manpower teams in industry, business, engineering, public service, or health service. I am convinced, therefore, that any absolute denial of program accreditation in the occupational fields is a futile and useless exercise.

If we accept, therefore, the proposition that program evaluation is a necessary and a good thing in these programs, or at least is with us now, we focus our attention on the most effective procedures and methods for judging quality and an acceptance of procedures and methods that will affect our institutions with the least cost of time, money, and effort, and which would, at the same time, offer ways to us for strengthening and improving programs. The procedures and methods of accreditation should work to the advantage of educational institutions and not be a principle of "policing" educational programs.

I would also submit to you that any kind of accreditation developed anywhere should be voluntary and should, I hope, be nongovernmental in nature. I would also submit to you that one of the ways in which we may find an acceptable accreditation procedure and method for various programs would be in the unified accreditation approach. This idea of unified accreditation is the basis for the AAJC Board of Directors resolution. It was suggested in the resolution that regional accrediting bodies have prime responsibility for program accreditation where needed or required. It could very well be that another body with the authority and the means to act could become the unifying force in accreditation. You and I know very well that our institutions cannot live with a procedure of specialized program accreditation that would call for a number of separate groups to come on our campuses, each requiring long preparation of survey materials and various other informational gambits, each consisting of three to seven members of the accreditation team, all of whom must be paid expenses and honorarium, and each consuming several days of program time, and each making its own unique demands and requirements on administration, faculty, and students. No institution has the time, the money, or can expend the effort for this kind of wasteful, duplicative, and meaningless accreditation.

If there can be a unity brought into the whole procedure of evaluation so that accreditation can be accomplished through one body or through only a small number of agencies and also that application can be made to developing programs, it is my belief that our institutions could find this an acceptable part of the educational program.

In closing, let me urge that you make use of the sources now available to learn all you can about the current accreditation. Such information can be obtained by writing the National Commission on Accrediting or the American Association of Junior Colleges. As a conclusion of this presentation to you, I would appreciate receiving from you any suggestions or ideas concerning acceptable ways for professionally judging and evaluating the quality of our programs and the student product which comes from them.

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THE CURRENT STATE OF ACCREDITATION OF POSTSECONDARY OCCUPATIONAL EDUCATION IN THE UNITED STATES

A Paper Prepared by

CHARLES F. WARD

Research Associate and Assistant Professor
of Industrial and Technical Education

CENTER FOR OCCUPATIONAL EDUCATION
North Carolina State University
at Raleigh

and Presented to

NATIONAL CONFERENCE ON ACCREDITATION OF
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PREFACE

This paper is in essence a summarization with accompanying conclusions of a study conducted by the writer during the past twelve months. The final report containing the findings of the study is in the process of publication and will be available within the next two to three months. Since the final report will be available to participants of this conference, footnotes and bibliography have been omitted in this paper.

The "For Discussion Only - Not for Distribution" on the cover indicates that this paper has not been formally reviewed by a review panel of the Center for Occupational Education. Center publications are reviewed by a panel of peers as a part of the publication process.

Introduction

One of the major goals of the Center for Occupational Education at North Carolina State University is the improvement of the evaluation of the quality and effectiveness of occupational education. To this end several research projects concerning various facets of the evaluative process in occupational education have been initiated. Among these are projects dealing with the economic returns of occupational education, effective budgeting and allocation of resources, effective policy-making, the assessment of student achievement, and the development of standards and criteria for the evaluation of occupational education.

This paper entails a summary of the findings and conclusions of a preliminary study in the area of the development of standards and evaluative criteria. The preliminary study focused on a determination of the current state of evaluation of postsecondary occupational education and was premised upon the assumption that before a systematic effort to develop standards and evaluative criteria is begun, a thorough knowledge of existing practices and techniques is desirable. The study encompassed the activities, practices and procedures of (1) the regional accrediting associations, (2) the specialized accrediting agencies, (3) the federal government, and (4) the various states to the extent that the activities of these entities impinge upon the evaluation of postsecondary occupational education.

Background

The increasing demand for technically and vocationally trained personnel over the last decade has resulted in a tremendous expansion of postsecondary occupational education. To meet this demand, both state and federal governments have increased emphasis on, and support for, postsecondary occupational education. Prior to 1960 the federal government contributed approximately $50 million a year to all vocational education. The 1963 Vocational Education Act abandoned the previously used concept of categorized allocation and raised the authorized federal contribution to a plateau of $225 million in 1965. Amendments enacted in 1968 raised the authorization to $542 million (all titles) for 1968 with annual increments reaching a plateau of $910 million by 1973. Thus within the 1960-70 decade the federal contribution to vocational education, a large portion of which is earmarked for postsecondary schools, increased over eighteen fold. Additionally, the federal government has provided funds under the Manpower Development Training Act of 1962, the Allied Health Professions Personnel Training Act of 1963-66, the Nurses' Training Act of 1964, the Higher Education Act of 1965, the Economic Opportunity Act of 1965, and the Health Manpower Act of 1968. Each of these acts provides substantial funds for postsecondary occupational education. At the same time many of the states have reacted by establishing or expanding statewide systems of community colleges, technical institutes, or area vocational schools and by appropriating ever-increasing amounts for occupational education. For example, on a nationwide average during 1968 the states were appropriating $3.65 for each dollar of federal funds appropriated under the 1963 and 1968 Vocational Education Acts.

Concomitant with the increased federal and state emphasis upon occupational education, there has been an emphasis upon research and evaluation to determine the quality and effectiveness of programs of occupational education. The 1963 Vocational Education Act required the establishment of a National Advisory Council to make a study (repeated at five-year intervals) of vocational education and to report to and advise the Secretary of Health, Education, and Welfare by January, 1968, concerning its recommendations for vocational education. Further, a substantial portion of the 1963 Act funds were earmarked for research, evaluation, development, and experimentation. The 1968 Amendments expanded the duties of the National Council to include a review of the administration and operation of vocational education programs, including the effectiveness of such programs in meeting the purposes for which they were established and operated; to conduct independent evaluations of programs; and to review possible duplication of vocational education programs at the postsecondary and adult levels. The 1968 Amendments also required each state to establish an advisory council to perform at the state level functions analogous to those of the National Advisory Council. The 1968 Amendments also stipulated that ten percent of all funds allocated to the states be used for research, training, development, experimentation, and evaluation.

Monies appropriated under the 1963 Vocational Education Act and the 1968 Amendments are allocated to the respective states and are spent in accordance with a previously approved state plan. However, many of the other acts enumerated above, including the Nurses' Training Act of 1964, the Higher Education Act of 1965, and the Allied Health Professions Personnel Training Act of 1966, allocate funds directly to individual institutions. To provide some degree of assurance that these funds are allocated only to institutions meeting minimum educational standards, Congress has included provisos in these acts to the effect that institutions are eligible recipients only if they (or a particular program to be funded) are accredited by a "nationally recognized" accrediting agency. Such provisos require the Commissioner of Education to provide a list of these nationally recognized accrediting agencies or associations which he determines to be reliable authority as to the quality of education offered within a particular program or institution. With the exception of one or two state agencies, the Commissioner of Education has turned to the regional accrediting associations and a number of specialized accrediting agencies to be arbiters of institutional or program quality. Although practically all of these agencies are extralegal and participation is "voluntary," they have, by virtue of these enactments, become quasi-governmental. Subjugation to their bylaws and regulations and adherence to their standards and evaluative criteria is a necessity if a public institution is to receive federally appropriated monies collected from the taxpayers of the respective states.

Since the extralegal accrediting associations are presently serving a governmental function by determining institutional eligibility for substantial amounts of federal funds, the reliability of the instruments used in the accrediting process and the validity of such instruments in predicting quality in programs of occupational education should be questioned. Other legitimate avenues of concern are: the extent to which these regional and specialized accrediting agencies and associations possess the expertise to make judgments concerning occupational education; the extent to which persons possessing expertise in occupational education are represented on decision and policy-making boards; and the extent to which the public interest is protected by the inclusion on decision and policy-making boards of individuals who represent the public interest and do not have a vested interest in the actions of the agency or association.

In the governmental sphere, there is a dearth of knowledge concerning the procedures and techniques which have been utilized in the evaluation of occupational education and in the extent to which the techniques utilized have been determined to be reliable and valid measures of a quality product.

Time and space prohibit presentation of a comprehensive analysis of literature pertinent to accreditation and evaluation of occupational education. To put the problem in perspective, however, at least a summary is necessary.

Literature reviewed suggested very basic differences among reputable individuals concerning the methods, scope, and procedures utilized by the specialized and regional accrediting agencies. The soundness of their methods and the validity of their criteria were questioned. Furthermore, they were accused of resisting needed changes, of an inability to evaluate quality in education, and of failure to agree among themselves upon relative emphasis to be placed upon different features of the evaluative process.

Strong differences of opinion were found to exist between the academic and vocational educators and within each group over the question of whether the accrediting agencies should even consider occupational education in their evaluative efforts. Those agreeing that at the postsecondary level occupational education should be subject to accreditation disagreed as to criteria. One faction argued that occupational education should adhere to and be measured by the same standards applied to higher education in general, whereas another faction contended that the objectives of occupational education differ substantially from those of academic education and, therefore, separate criteria which measure the extent to which these objectives are met should be used to evaluate it. To compound the issue Congress has made accreditation by these agencies and associations a prerequisite for receipt of federal funds for certain occupational programs under several different acts.

In considering research efforts in accreditation and evaluation as they relate to postsecondary occupational education, a dichotomy between the two is immediately apparent. Studies concerning accreditation tend to be descriptive in nature with literally no attempts to ascertain the reliability of evaluative criteria or their validity in predicting a quality product. Two studies indicated very little difference in the product of accredited versus nonaccredited teacher education programs, but the measures considered were not necessarily measures of the effects of an instructional program. One study of small colleges indicated that accreditation affects library allocations and funds for physical facilities, administration, and salaries much more so than it affects curriculum changes, innovations or the evaluation of instruction. It was considered that perhaps this is indicative of the areas of emphasis in the accrediting process.

Recent efforts in the field of occupational education evaluation, conducted outside the realm of accreditation, denote the application of several scientific principles and techniques to the assessment of quality in occupational education. Among the techniques reviewed were cost-benefit analysis, cost-effectiveness analysis, systems analysis, decision-making models, and the development of achievement measures with demonstrated reliability and content validity. None of these techniques were found in the analysis of literature on evaluation in accreditation.

In summary, with regard to occupational education the literature review indicated a lack of knowledge of: (1) the extent of the accrediting activities of the various accrediting agencies in the area of postsecondary occupational education; (2) the approach by the various accrediting agencies to accreditation of postsecondary occupational education; (3) the administrative structure under which such accreditation occurs; and (4) the standards and evaluative criteria used in the accrediting process. A lack of application of scientific evaluative techniques in the process of accreditation was strongly suggested. Further, very few data were available concerning the efforts or the influence of the various states and the federal government in the evaluation or accreditation of occupational education.

Objectives of the Study

The specific objectives of the study were:

1. To gather, synthesize, and analyze data from the various regional and specialized accrediting agencies and associations in regard to: (a) scope of their activities in postsecondary occupational education; (b) the administrative structure under which accreditation of occupational education is effected; (c) philosophy of accreditation; (d) clientele and membership; and (e) the standards andevaluative criteria utilized to evaluate postsecondary institutions offering occupational education.

2. To ascertain the extent to which the federal government is engaged in activities of an evaluative or accreditative nature within the realm of postsecondary occupational education and to analyze available studies, regulations or statutes affecting evaluation of postsecondary occupational education.
3. To gather, synthesize, and analyze data concerning the extent to which the various states are engaged in the evaluation or accreditation of postsecondary occupational education and to analyze standards and evaluative criteria used.
4. To determine the extent to which the various state or public institutions within a state are participating or seeking membership in the regional and specialized accrediting agencies.
5. To determine the extent to which federal, state, or local licensing may be a factor in the evaluation of occupational education.
6. To assess the opinions of state officials responsible for vocational education or the operation of state systems of postsecondary area vocational schools, technical institutes, or community colleges regarding their opinions as to: (a) the adequacy and pertinence of standards and evaluative criteria used by accrediting agencies to evaluate postsecondary occupational education; (b) the adequacy of specialists in occupational education on association staffs and visitation teams; and (c) whether administrative structures of regional associations are conducive to adequate and fair evaluation of postsecondary occupational education.

Summary of Findings of the Study

The following sections present a summary of the findings of the study as they pertain to (1) the regional accrediting associations, (2) the specialized accrediting associations, (3) the federal government, and (4) the states.

The Regional Accrediting Associations

The concept of regional associations of colleges and secondary schools evolved to cope with the need within a region for more uniform standards among the secondary schools and more uniform entrance examinations among the colleges. The process of "certifying" secondary schools practiced in the late 1890's was broadened to include the concept of "accrediting" colleges and universities. Accrediting first began in the North Central Association in 1913, and it was not until 1952 that the practice was finally adopted by all the regional associations.

To put accreditation of institutions offering postsecondary occupational education in proper perspective required an analysis of the administrative structure, philosophy, membership, and evaluative standards and criteria of each of the six regional associations into which the United States is divided.

Analysis of the administrative structures of the various associations showed that the approaches to accreditation of postsecondary occupational education to be almost as numerous as the associations. The Middle States Association contended that virtually all postsecondary occupational education in its area was offered in community colleges, and such institutions were accredited by its Commission on Higher

Education. The Northwest Association indicated that much the same condition prevailed in its region but acknowledged that its Commission on Higher Schools had recently evaluated and accredited two "technical colleges." The North Central Association acknowledged that a problem existed in its region and that its Commission on Colleges and Universities was assuming responsibility for the accreditation of postsecondary occupational education whether in community colleges, technical institutes, or postsecondary vocational schools, regardless of whether a degree is awarded upon completion. The New England Association and the Southern Association have chosen to demarcate responsibility for accreditation of postsecondary occupational education solely on the basis of whether the institution offering such education awards an associate degree, but here the similarity ends. Within the New England Association degree granting institutions are accredited by the Commission on Institutions of Higher Education, whereas the Commission on Public Secondary Schools has been given the responsibility of accrediting both secondary schools and technical-vocational schools. The Commission is presently utilizing an Ad Hoc Committee on Vocational Education to accomplish this purpose. Recent action by the New England Association suggests, however,that a separate independent commission to accredit occupational education from grades 10 through 14 may be created. In the Southern Association the Commission on Colleges has assumed responsibility for the accreditation of all degree granting institutions including technical institutes, but a separate Committee on Occupational Education has been established (and will probably evolve into an independent commission) to accredit postsecondary institutions not offering an associate degree. Unlike the other regionals, the Western

Association has two commissions responsible for accrediting degree granting institutions. The Commission for Senior Colleges and Universities accredits four-year colleges and universities, whereas the Commission for Junior Colleges accredits all two-year degree granting institutions. No non-degree postsecondary institutions were acknowledged to exist in the region, but it was indicated that the Junior College Commission had accredited a limited number of "special purpose" institutions.

Membership on the boards of trustees and on the commissions of the associations was found to be limited for the most part to persons from accredited institutions, and many of the commissions were found to be self-perpetuating to a degree in that they nominate succeeding members subject only to ratification by the membership. Persons without a vested interest or representatives of the public insterest were not found in the power structure of any of the regional associations. Moreover, where postsecondary occupational education was found to fall within the purview of the commissions which accredit senior colleges and universities, representation of the institutions offering occupational education was most often not commensurate with the proportion of the membership accounted for by these institutions. Finally, membership on boards of trustees of the associations and on higher commissions accrediting postsecondary occupational education was found to be overwhelmingly dominated by senior college and university presidents, vice presidents, and deans.

In terms of philosophy no major differences were found to exist among the regional associations. Though variously stated, each espouses "voluntary self-government" and an intent to develop and maintain sound educational standards which "ensure" quality education.

Within each association membership is institutional and membership denotes accreditation, but eligibility for consideration for membership appears to differ. The North Central Association, the Middle State Association, and the Southern Association specify that institutions must be either public or non-profit. The stand of the Northwest Association on this issue was not ascertainable from the available data. From analysis of the bylaws, the New England Association and the Western Association apparently do not exclude proprietary schools from eligibility. If public, postsecondary, non-degree granting, occupational education institutions exist in the Middle States Association region, the Northwest Association region, or the Western Association region, such institutions are precluded from eligibility because of the "degree granting" requirement of the commissions accrediting higher education.

The standards and evaluative criteria of the six regional associations were found to cover basically the same areas within an institution. Each association requires an institutional self-evaluation prior to association evaluation, and, though variously grouped, standards usually entailed as a minimum an institution's purposes and objectives, administration, faculty, student personnel, curriculum (programs), physical facilities, library, and finances. Some additionally include graduate schools, research, and special services. Similarities end, however, with areas covered. Standards were found to vary from a series of questions to which an institution must react to very brief and general statements considered as "guides" to elaborately detailed specifications or interpretations which include such criteria as the minimum number of hours the library should be kept open, the minimum acceptable proportion of various levels of advanced degrees held by the faculty members, and the minimum annual budget for various types and sizes of institutions. For the most part, however, standards were found to be very general in nature, couched in "the objectives of the institution," and avowedly more "qualitative" than quantitative. All standards and criteria currently used to accredit postsecondary institutions offering occupational education, except those of the Western Association, were designed by academicians within the four-year colleges and universities to apply to these institutions. Within the Western Association standards were designed specifically for comprehensive public junior colleges which are expected to offer occupational education. At present the North Central Association is modifying its standards "to give recognition to institutions which do not follow the traditional collegiate pattern." Within the Southern Association representatives of occupational education are developing new standards and guidelines to apply to non-degree granting postsecondary occupational education institutions; and the New England Association has developed some standards which, along with evaluative criteria used to evaluate technical and vocational curricula in secondary schools, are ultimately to be applied to postsecondary non-degree granting institutions in the New England region.

From all the materials analyzed and from the literature reviewed, no evidence was found to suggest that the regional associations are interested in, or have engaged in, scientific studies to ascertain either the reliability with which standards or evaluative criteria can be applied, or to determine the validity of such standards or evaluate criteria in predicting the output of a quality product.

Specialized Accrediting Agencies

Program or special purpose accreditation first began in the professions in the early 1900's. Contrary to the aims of institutional accreditation, professional accreditation was motivated by the desires of the individuals in a given profession to attain a high vocational status. By the late 1930's and early 1940's specialized accreditation had spread to certain types of proprietary schools not necessarily operating at the professional level, but usually not eligible for consideration by the regional associations. The 1950's saw a tremendous expansion of and emphasis upon technical and vocational education, much of which was closely allied to the professions; and during this period many of the professional accrediting agencies extended their accrediting efforts downward to include these supportive occupations.

The study showed that 31 specialized accrediting agencies are at present recognized by the Commissioner of Education as being "reliable authority as to the quality of education" offered in certain professions, occupations, or special purpose institutions. These agencies and the type and level of accreditation practiced by each are presented in Table 1. Of these 31 agencies it was found that only nine accredit curricula, programs, or institutions considered occupational in nature. These nine are: (1) the Accrediting Commission for Business Schools; (2) the American Association of Nurse Anesthetists; (3) the American Dental Association; (4) the American Medical Association; (5) the Engineer's Council for Professional Development; (6) the National Association for Practical Nurse Education and Services; (7) the National Association of Trade and Technical Schools; (8) the National Home Study Council; and

Table 1. Specialized Accrediting Agencies and the Type and Level of Accreditation Each Provides

Agency	Type of Accreditation		Level of Accreditation		
	Institutional	Program(s)	Professional	Baccalaureate	Occupational
Accrediting Association of Bible Colleges	x			x	x[a]
Accrediting Commission for Business Schools	x			x	x
American Association of Collegiate Schools of Business	x		x	x	
American Association of Nurse Anesthetists	x	x			x
American Association of Theological Schools	x	x	x		
American Bar Association		x	x		
American Chemical Society		x		x	
American Council on Education for Journalism		x	x	x	
American Council on Pharmaceutical Education		x	x	x	
American Dental Association		x	x	x	x
American Library Association		x	x		
American Optometric Association	x	x	x		

Table 1. (continued)

Agency	Type of Accreditation		Level of Accreditation		
	Institutional	Program(s)	Professional	Baccalaureate	Occupational
American Osteopathic Association	x	x	x		
American Podiatry Association		x	x		
American Public Health Association, Inc.	x	x	x		
American Speech and Hearing Association		x	x		
American Veterinary Medical Association		x	x		
Association of American Medical Colleges		x[a]			
Association for Clinical Pastoral Education		x	x		
Council on Medical Education Of the American Medical Association		x	x	x	x
Council on Social Work Education		x	x		
Engineer's Council for Professional Development	x	x	x	x	x
National Architectural Accrediting Board		x		x	

Table 1. (continued)

Agency	Type of Accreditation		Level of Accreditation		
	Institutional	Program(s)	Professional	Baccalaureate	Occupational
National Association for Practical Nurse Education and Services, Inc.		x			x
National Association of Schools of Art	x	x	x	x	x[a]
National Association of Schools of Music	x	x	x	x	
National Association of Trade and Technical Schools	x				x
National Council for Accreditation on Teacher Education		x	x	x	
National Home Study Council	x			x	x
National League for Nursing, Inc.		x	x	x	x
Society of American Foresters		x	x	x	

a. Actually less than baccalaureate, but not normally considered occupational.

(9) the National League for Nursing. For each of these agencies an analysis was made of the administrative structure under which accrediting is implemented, philosophy of accreditation, clientele and membership, and standards and evaluative criteria used.

Administrative structure among the nine agencies or associations was found to vary markedly, particularly when those organizations of a "professional" nature were compared to those of a "proprietary" nature. The accrediting arms of the American Dental Association, the American Medical Association, and the Engineer's Council for Professional Development are not autonomous, but are responsible to either the organization's board of trustees or to the membership which is comprised entirely of persons in the profession. (The same is true of the American Association of Nurse Anesthetists). The National Association for Practical Nurse Education and Services and the National League of Nursing are somewhat more representative of other interests in that they have representatives of medicine, hospital administration, and other potential employers of graduates on the accrediting boards. Conversely, the Accrediting Commission for Business Schools, the National Association of Trade and Technical Schools, and the National Home Study Council have accrediting arms which are autonomous of both the total membership and the board of control of the parent organization. These accrediting boards also have a large component, though never a majority, of persons having no vested interests in the decisions of the board and who could be considered representatives of the public interest.

No major differences in philosophy among the agencies was noted. Though variously stated, their usual aims are to upgrade the profession or the institution, insure a quality output, and "protect the public interest."

Within several of the agencies or associations, clientele and membership are not synonymous. Neither the American Dental Association nor the American Medical Association require institutional membership nor do they charge for accreditation services. The National League for Nursing does not require institutional membership but does charge a very substantial accreditation and annual "sustaining" fee. Usually the agencies which accredit in the proprietary realm charge a substantial accrediting fee and require institutional membership and annual dues once an institution is accredited. The number and type of institutions or programs accredited by the several agencies are shown in Table 2.

Analysis of the standards and evaluative criteria used showed substantial differences among the specialized accrediting agencies. Those agencies which accredit institutions were found to have standards similar to those of the regional associations with those in the proprietary sector placing more stress upon ethical considerations and often having more specific requirements for professional preparation and work experience of faculty. The professional associations were also found to put more stress upon professional standing and experiences of the faculty and to also specify or recommend licensing and/or certification within the speciality taught. Considerably less emphasis was placed upon supporting services and facilities such as libraries, student personnel services, classrooms, and overall administration. As was true of the regional associations, no evidence was found which would indicate any scientific effort in the

Table 2. Number of Institutions or Programs Accredited by Specialized Accrediting Agencies in the Occupational Field

Accrediting Agency	Type of Program or Institution	Number of Programs or Institutions
Accrediting Commission for Business Schools	1-Yr. Schools of Business	100
	2-Yr. Schools of Business	169
	Junior Colleges of Business	45
	Senior Colleges of Business	4
	Data Processing Institutes	10
American Association of Nurse Anethetists	Hospital Schools of Anesthesiology	193
American Medical Association	Dental Assistant	151
	Dental Hygienist	68
	Dental Lab Technicial	21
American Medical Association	Certified Laboratory Assistant	187
	Cytotechnologist	118
	Inhalation Therapy Technician	55
	Medical Assistant	0
	Medical Record Technician	20
	Nuclear Medicine Technician	0
	Orthopaedic Assistant	0
	Radiation Therapy Technologist	0
	Radiologic Technologist	1,152
Engineer's Council for Professional Development (All are technology programs of at least two academic years duration)	Aerospace-Aeronautics	5
	Aircraft Design	1
	Aircraft Maintenance	2
	Air Conditioning	6
	Architectural	5
	Automotive and Engine	3
	Chemical	8
	Civil	24
	Commerical Broadcast	1
	Computer and Data Processing	3
	Drafting-Design	25

Table 2. (Continued)

Accrediting Agency	Type of Program or Institution	Number of Programs or Institutions
Engineer's Council for Professional Development (continued)	Electrical	21
	Electronics	42
	Fire Protection	1
	Industrial	4
	Instrumentation	1
	Manufacturing and Tool	8
	Mechanical	35
	Metallurgical	1
	Nuclear	1
	Sanitary	1
National Association for Practical Nurse Education and Service	Practical Nursing Programs	42
National Association of Trade and Technical Schools	Private Trade and Technical Schools	166
National Home Study Council	Private Home Study Schools	120
National League for Nursing	Associate Degree Nursing Programs	66
	Diploma Nursing Programs	567
	Practical Nursing Programs	17

development of standards or evaluative criteria, nor were any studies concerning reliability or validity of instruments noted.

The Federal Government

The study entailed an analysis of federal government programs and operations which have a substantial involvement in occupational education and which have implications for either accreditation or evaluation in the field of occupational education. Functions conforming to these criteria were analyzed in the Office of Education, the Department of Labor, the Office of Economic Opportunity, the Veterans' Administration, and the Federal Aviation Agency.

Within the Office of Education, the major implication for evaluation of occupational education was found to be in the extensive research funding done by the Bureau of Research. With regard to accreditation, the major implication lies in the fact that the Commissioner of Education is required by congressional mandate to maintain and publish a list of accrediting associations and agencies which he recognizes as being authoritative assessors of quality in certain regions, institutions, or subject matter areas. The study showed that approximately thirty categories of federal aid to public institutions as provided by eight laws enacted since 1963 alone require accreditation by these "recognized" agencies as a prerequisite for the allocation of federal funds. To effect the evaluation of the various accrediting agencies requesting national recognition, an Accreditation and Institutional Eligibility Staff has been created within the Bureau of Higher Education. This Staff is currently assessing the procedures and criteria used by the regional accrediting associations and several of the specialized accrediting agencies which were initially recognized by the Commissioner solely because recognition was accorded them by the National Commission on Accrediting.

Within the Department of Labor and the Office of Economic Opportunity most evaluation of occupational education was found to be either of a job placement or of a cost-benefit nature which is of more value to the economists than to educators, or at best can serve as only one of many inputs in educational decision making. One study did approach evaluation on a cost-effectiveness basis which is of more relevance to education.

The Veterans' Administration, in administering the veterans' training programs, was found to rely upon accrediting agencies or associations recognized by the Commissioner of Education or upon state approval agencies to evaluate programs or institutions for approval by the Veterans' Administration. Guidelines set forth for the state approving agencies were very general and overwhelmingly quantitative. A third alternative for the approval of veterans' benefits is that all vocational programs receiving federal funds through the Smith-Hughes and subsequent vocational acts which require conformity to a state plan are automatically approved under the law.

Finally, the Federal Aviation Agency was found to operate a very large program of certification and licensing for the civilian aviation industry. Examination of the criteria used to evaluate aircraft mechanics schools showed them to be totally quantitative and process oriented, but this quantitative process evaluation is complemented by a rigorous written, oral, and performance examination effort which is highly qualitative and a prerequisite for licensing the individual.

State Programs of Accreditation Evaluation and Approval

Analysis of data collected from 41 state directors of vocational education and 39 directors of state systems of two-year colleges showed that only seven states, Florida, Kansas, Maryland, Missouri, Montana, Oklahoma, and Wisconsin, operate a program of formal institutional accreditation involving either two-year colleges or other postsecondary institutions offering occupational education. An additional nine states indicated the use of a program of institutional evaluation. These states are Colorado, Iowa, Kentucky, New Mexico, North Carolina, Rhode Island, South Carolina, South Dakota and Texas. Whether the programs operated by Rhode Island and Texas applied to the postsecondary level was not readily ascertainable although such was indicated; it was determined that the materials were developed for use at the secondary level. Several additional states indicated the use of program approval in postsecondary occupational education and only 11 states indicated that neither accreditation, institutional evaluation, program approval, nor curriculum approval or evaluation was practiced. The various types of evaluation or accreditation in operation in the various states are summarized in Table 3.

To the extent that materials were provided, the standards and evaluative criteria used by each state were synthesized and analyzed. As they pertained to institutional accreditation or evaluation, the materials were not found to be markedly different from those of the regional associations. Some of the states were found to have gone futher, however, in the development of evaluative criteria as measures of broad standards than have the regional associations. Where program or curriculum evaluation was found to be practiced, the standards and evaluative criteria tended to be more

Table 3. **Presence of State Programs of Institutional Accreditation, Institutional Evaluation, Program Approval, or Curriculum Approval in Public Post-High School Institutions Offering Occupational Education**

State	Activity				Applicability	
	Institutional Accreditation	Institutional Evaluation	Program Approval	Curriculum Approval or Evaluation	Vocational-Technical Schools	Junior or Community Colleges
Alabama	No	No	Yes	Yes	x	x
Alaska	No	No	No	Yes	x	x
Arizona	No	No	Yes	Yes		x
Arkansas	No[a]	No[a]	No[a]	No[a]		x
California	No	No	No	Yes		x
Colorado	No	Yes	Yes	Yes	x	x
Connecticut	No	No	No	No	x	x
Delaware	No	No	Yes	Yes		x
Florida	Yes	Yes	Yes	Yes	x	x
Georgia	No[a]	No[a]	No[a]	No[a]		x
Hawaii	No	No	Yes	Yes		x
Idaho	No	No	No	Yes	x	
Illinois	No	No	No	Yes		x
Indiana	No	No	Yes	Yes	x	
Iowa	No	Yes	Yes	Yes	x	x
Kansas	Yes	Yes	Yes	Yes	x	x
Kentucky	No	Yes	Yes	Yes	x	x
Louisiana	No	No	Yes	Yes	x	
Maine	No	No	No	No	x	
Maryland	Yes[a]	Yes[a]	Yes[a]	Yes[a]		x
Massachusetts	No[b]	No[b]	Yes[b]	Yes[b]	x	
Michigan[c]						
Minnesota	No	No	Yes	Yes	x	x
Mississippi[c]						
Missouri	Yes	Yes	No	No		x

a. Applies to community or junior colleges only.
b. Applies to Vocational-Technical Schools only.
c. Data not provided.

Table 3. (continued)

State	Activity				Applicability	
	Institutional Accreditation	Institutional Evaluation	Program Approval	Curriculum Approval or Evaluation	Vocational-Technical Schools	Junior or Community Colleges
Montana	Yes	Yes	No	Yes	x	x
Nebraska	No	No	No	Yes	x	
Nevada	No	No	Yes	No	x	x
New Hampshire	No	No	Yes	No	x	
New Jersey	No[a]	No[a]	Yes[a]	Yes[a]		x
New Mexico	No	Yes	No	Yes	x	
New York	No	No	Yes	Yes	x	x
North Carolina	No	Yes	Yes	Yes	x	x
North Dakota	No Response					
Ohio	No	No	Yes	Yes	x	x
Oklahoma	Yes	Yes	Yes	No		x
Oregon	No	No	No	Yes		x
Pennsylvania	No	No	Yes	Yes		x
Rhode Island	No[b]	Yes[b]	Yes[b]	No[b]	x	
South Carolina	No	Yes	Yes	Yes	x	
South Dakota	No	Yes	Yes	Yes	x	
Tennessee	No[b]	No[b]	No[b]	Yes[b]	x	
Texas	No	Yes	Yes	Yes	x	x
Utah	No[b]	No[b]	No[b]	No[b]		
Vermont	No	No	No	No	x	
Virginia	No	No	Yes	Yes	x	x
Washington	No	No	No	Yes		x
West Virginia	No	No	Yes	Yes	x	
Wisconsin	Yes	Yes	Yes	Yes	x	x
Wyoming	No	No	No	No		

a. Applies to community or junior colleges only.
b. Applies to Vocational-Technical Schools only.
c. Data not provided.

objective than those used for institutional evaluation. Efforts toward objectivity included the use of present-absent or yes-no dichotomies and the use of various types of rating scales. Even so, it was noted that a subjective assessment by a rater was most often the rule. No study concerning reliability or validity of the instruments used was uncovered in any of the materials reviewed.

Data gathered concerning regional association accreditation of institutions within the various states showed that nationwide there are more postsecondary institutions offering occupational education which are not accredited (533) than there are which are accredited (486). Analysis of the data on the basis of regional association areas showed that the problem of nonaccredited institutions was most acute in the areas served by the North Central Association and the Southern Association. These data are shown in Table 4.

Concerning the perceptions of accreditation of occupational education by the regional associations held by state directors of vocational education and directors of state systems of two-year colleges, the majority of those responding felt that occupational education specialists on regional association staffs and on visitation teams are inadequate. Further, a majority of those responding felt that standards and evaluative criteria used to accredit occupational education are neither adequate nor relevant. A breakdown of these responses is shown in Tables 5, 6, and 7 on pages 31, 32 and 33.

State and local licensing were found to be a major factor in no more than 10 occupations. Primarily these are in the health or paramedical field, registered nursing, practical nursing, x-ray technology, dental

Table 4. Accredited Status of Post-High School Institutions Offering Occupational Education--by State and Regional Association

Regional Association	State	Correspondent Status	Affiliate Status	Fully Accredited Status	Not Accredited
Middle States	Delaware	1	1	3	0
	Maryland[a]	1	2	10	0
	New Jersey[a, c]			(5)[d]	(1)
	New York	6	8	28	0
	Pennsylvania	3	6	3	0
	District of Col.[c]				
	Total	11	17	44 + (5)	0 + (1)
New England	Connecticut	0	0	4	(12)
	Maine	2	0	0	3
	Massachusetts	0	0	(4)	10 + (10)
	New Hampshire	0	10	3	8
	Rhode Island	0	0	1	(1)
	Vermont	0	0	0	1
	Total	2	10	8 + (4)	22 + (23)

a. Reply from community or junior college director only.

b. Reply from state director of vocational education only.

c. Data not provided.

d. Date in parentheses were taken from Directory American Association of Junior Colleges, 1968. Figures represent only junior or community colleges and institutions were listed as either accredited or not accredited by the respective regional association.

Table 4. (continued)

Regional Association	State	Corre- spondent Status	Affiliate Status	Fully Accred- ited Status	Not Accred- ited
North Central	Arizona[b]	3	0	7	0
	Arkansas[a,c]			(1)	(2)
	Colorado	5	1	11	3
	Illinois[a,c]			(21)	(13)
	Indiana	1	2	30	3
	Iowa[a]	5	0	4	11
	Kansas	13	2	4	0
	Michigan[c]			(14)	(9)
	Minnesota	0	0	0	27
	Missouri[c]			(6)	(6)
	Nebraska	1	0	0	7
	New Mexico	0	0	14	1
	North Dakota	No	Response	(2)	(2)
	Ohio[a,c]			(5)	(2)
	Oklahoma	1	2	31	15
	South Dakota	0	0	5	0
	West Virginia	0	0	0	3
	Wisconsin[b]	4	2	2	10
	Wyoming	2	7	9	2
	Total	35	16	116 + (49)	82 + (34)
Northwest	Alaska[b]	0	0	3	14
	Idaho[b]	0	0	5	0
	Montana	8	0	9	0
	Nevada	2	0	1	0
	Oregon	0	3	9	0
	Utah	0	0	3	0
	Washington	2	0	20	0
	Total	12	3	50	14

Table 4. (continued)

Regional Association	State	Correspondent Status	Affiliate Status	Fully Accredited Status	Not Accredited
Southern	Alabama	4	6	7	36
	Florida	3	7	22	18
	Georgia	0	5	26	20
	Kentucky[b]	0	0	0	12
	Louisiana	0	0	0	32
	Mississippi[a]	3	0	14	0
	North Carolina	22	0	11	17
	South Carolina	8	1	2	3
	Tennessee	0	22	1	0
	Texas	0	0	34	9
	Virginia	12	5	3	0
	Total	52	46	120	147
Western	California	0	0	90	0
	Hawaii	5	0	0	1
	Total	5	0	90	1
Grand Total		117	92	428 + (58)	266 + (58)

Table 5. Reactions of State Directors of Vocational Education and State Directors of Two-Year College Systems Concerning the Adequacy of Accreditation and Evaluation in Occupational Education Performed by Regional Associations, Specialized Agencies, and States

Regional Association	Regional Associations		Specialized Agencies		States	
	Adequate	Inadequate	Adequate	Inadequate	Adequate	Inadequate
Middle States	5	0	2	1	3	0
New England	1	1	1	1	1	0
North Central	0	13	3	2	7	4
Northwest	1	2	2	1	3	0
Southern	4	5	2	2	5	1
Western	1	2	1	0	1	0
Total	12	23	11	7	20	5
Percent of Total	34	66	61	39	80	20

Table 6. Reactions of State Directors of Vocational Education and State Directors of Two-Year College Systems Concerning the Adequacy of Specialists in Occupational Education on Regional Association Staffs and Evaluation Teams, and the Adequacy of Evaluative Criteria Used

Regional Association	Regional Association Staffs		Regional Association Evaluation Teams		Evaluative Criteria	
	Adequate	Inadequate	Adequate	Inadequate	Adequate	Inadequate
Middle States	1	0	2	0	3	0
New England	0	1	2	2	1	2
North Central	0	6	0	6	0	4
Northwest	0	1	2	1	1	2
Southern	2	1	2	2	0	4
Western	0	0	0	0	0	0
Total	3	9	8	11	5	12
Percent of Total	25	75	42	58	29	71

Table 7. Summary Responses of State Directors of Vocational Education and State Directors of Two-Year College Systems Concerning Suitability of Administrative Structure, Adequacy of Staff, and Relevance of Criteria Used by Accrediting Associations to Accredit Postsecondary Occupational Education

Regional Association	Total States	System Directors	Total Response	Positive Response	Negative Response
Middle States	5	Vocational Education	1	1	0
		Two-Year Colleges	4	4	0
New England	6	Vocational Education	3	1	2
		Two-Year Colleges	2	0	2
North Central	19	Vocational Education	10	0	9[a]
		Two-Year Colleges	6	0	4[a]
Northwest	7	Vocational Education	3	0	1[a]
		Two-Year Colleges	3	1	2
Southern	11	Vocational Education	5	1	4
		Two-Year Colleges	5	1	4
Western	2	Vocational Education	1	0	1
		Two-Year Colleges	2	1	1
Total	50	Vocational Education	23	3	17
		Two-Year Colleges	22	7	13
Percent of Total		Vocational Education	100	13	74
		Two-Year Colleges	100	32	59

a. Differences in total response and positive response not accounted for by negative response are due to noncommital responses.

hygienists, etc. In the building trades plumbing and electrical wiring most often are licensed occupations, and in service occupations barbering and cosmetology are most often licensed. The extent to which licensing of graduates of various occupational curricula is a factor is depicted in Table 8.

Conclusions and Implications

From the study certain conclusions appear warranted--indeed demanded.

Regional Accrediting Associations

Problems relating to accreditation by regional associations of institutions offering postsecondary occupational education are attributable to three primary sources: (1) administrative structure; (2) inadequate and irrelevant standards; and (3) a lack of scientific foundation in the accrediting process.

Among the regional associations the approaches to accrediation of postsecondary occupational education are as numerous as the associations themselves, none of which, to this date, are adequate to the task. Currently postsecondary institutions offering occupational education but not awarding associate degrees are eligible for accreditation in only ~~two~~ three of the regional associations, the Southern, ~~and~~ the New England Association the North Central. Within these ~~two~~ three associations associate degree granting technical institutes and two-year colleges which offer job oriented occupational education are accredited by the commisisons which accredit four-year colleges and universities. Non-degree granting institutions in the New England Association are accredited by an ad hoc committee under the secondary school

Table 8. Occupational Curricula Which Require Licensing of Graduates

Occupation	Number of States Requiring
Automotive Mechanics	3
Aviation Mechanics	22
Barbering	34
Carpentry	1
Medical Laboratory Assistant	3
Commercial Electrician	21
Cosmetology	38
Dental Assistant	15
Dental Hygenist	21
Funeral Director	1
Land Surveyor	1
Mason	1
Motor Vehicle Salesman	1
Mobile Home Salesman	1
Medical Laboratory Technician	1
Mortician	1
Inhalation Therapist	2
Insurance Adjuster	1
Junior Accountant	1
Plumber	19
Practical Nurse	39
Radio-T.V. Technician	4
Real Estate Salesman	2
Registered Nurse	37
X-Ray Technician	20

commission and the Southern Association by a recently formed Committee on Occupational Education. These variations exist even though the programs may be identical in scope, level and intent between the degree granting and non-degree granting institutions.[1] In the Middle State Association, the Northwest Association and the North Central Association only degree granting institutions are, at this time, eligible for consideration for accreditation, in each instance by the commission which accredits four-year colleges and universities. (The North Central Association is taking steps to extend eligibility to non-degree granting institutions.) In the Western Association there is a separate Junior College Commission which accredits degree granting two-year institutions only.

Clearly these prevailing conditions are attributable to the archaic administrative structures under which the regional associations were initially formed to accredit four-year colleges and universities on the one hand and secondary schools on the other in an era during which occupational education was confined to apprenticable trades or relegated to "vocational training schools" for deliquents. Today occupational education is an entity in its own right. It deserves equal standing with academic education in the secondary schools and in the colleges and universities and is entitled to be governed by those with expertise in occupational education. Analysis of the composition of the commissions which accredit colleges and universities makes it abundantly clear that these commissions are dominated by those in higher education, primarily chancellors, presidents, and vice presidents of colleges and universities. In the Southern Association for example the Commission on Colleges, which is jealously guarding its self-proclaimed prerogative to accredit all institutions offering associate degrees, including technical institutes which offer no programs designed for transfer, has an institutional membership comprised of approximately sixty percent four-year institutions and forty percent two-year colleges and technical institutes. Yet only 19 percent of the Commission membership represents such two-year institutions. As a matter of fact the public schools have more representation (20 percent) on the Commission than do the two-year colleges. In the Middle States Association two-year colleges account for in excess of 14 percent of the institutional membership of the Commission on Higher Education, yet out of 17 members the Commission has only 1 member (six percent), a community college dean, representing two-year colleges. The North Central Association Commission on Colleges and Universities at present has 5 of 64 members (8 percent) representing two-year colleges yet such institutions comprise 20 percent of the membership. Though data on the Northwest Association were not available, there is no reason to expect the situation to be any different there. It is abundantly clear that if two-year colleges, technical institutes, and area vocational schools are to receive just representation within the regional associations there must be a realignment of institutional membership of two-year institutions into separate commissions. Commissions which, it is hoped, would ensure adequate representation of those with responsibilities and expertise in occupational education. The dichotomization of postsecondary occupational education between two commissions solely on the basis of whether an associate degree is awarded upon completion certainly is not an appropriate solution to the problem. A restructuring of the regional associations to provide equitable representation for occupational education under a tenable administrative structure is long overdue, and those in positions of responsibility in occupational education should accept no less. Further, the present procedures in which the interactions of the accrediting process are exclusively between an institution and the regional association, completely bypassing state boards of education and state-level officials having overall responsibility for a system's operation ignore the realities of responsibility and authority of highly centralized state systems. Bylaw modifications are in order to ensure equitable representation of these officials in the power structures of the several associations.

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[1] The New England Association has begun action which will probably result in the formation of a separate commission to accredit occupational education at grade levels 9-14 unless such is offered in a community college or other institution offering college transfer work.

The problem of inadequate and irrelevant standards for the evaluation of occupational education is in part attributable to the problem of administrative structure discussed above. The academic educators on the commissions which accredit four-year colleges have deduced, without benefit of expertise and with very little knowledge of occupational education, that the standards by which four-year colleges are judged are equally applicable to two-year institutions offering occupational education. Aside from the fact that these standards have little demonstrated validity in the assessment of quality in four-year institutions, no recognition is made of the fact that the objectives of occupational education are often entirely different from those of academic education at either the two-year or four-year level. Whereas postsecondary academic education strives to raise standards through highly selective admission practices which ensure highly competent and homogenous groups, occupational education strives to provide opportunities to a broad spectrum of potential students. Whereas academic education places major emphasis upon the academic preparation of instructors, occupational education places emphasis upon relevant previous experience, skill and expertise in the field taught. Whereas much academic education is directed inward (or upward to graduate school), occupational education is closely aligned to and draws upon the expertise of those who employ the graduates.

These are only a few of the reasons which lead one rationally to the conclusion that occupational education should be judged by standards and evaluative criteria different from those used to assess quality in academic education. These help to explain why the majority of responding state directors of vocational education and directors of two-year college systems indicated a belief that present standards are inadequate and irrelevant. Moreover, to contend, as do the academicians within the associations, that each institution is evaluated in terms of its stated objectives is to acknowledge a lack of understanding of and appreciation for the role of occupational education. Due partly to strong financial support by federal and state governments and partly to the residual role of occupational education--in that it must strive to serve the needs of a variety of people whose needs are unmet by restricted purpose secondary schools and colleges--any institution offering occupational education has a broad obligation to society. Each institution should be evaluated in terms of its effectiveness in meeting this obligation, irregardless of whether the many facets of this responsibility are acknowledged in formally stated institutional objectives.

The most alarming finding of the study, which applies equally to the regional and specialized accrediting agencies, is the lack of application of scientific principles and techniques to the evaluative process upon which the decision to extend or deny accreditation rests. Charges were found in the literature adducing undue emphasis upon process to the neglect of product, the use of empirical methods in the development of standards, and a lack of knowledge of the reliability with which standards could be measured or the validity of these standards in predicting quality in the product of the educational process. These charges were amply substantiated in the study. No where in the literature of any of the regional or specialized accrediting agencies was there found evidence of efforts to determine interrater or replication reliability of standards and criteria measurement or a determination of the correlation between process and product variables. It appears fair to say that the evaluative process in accreditation has not advanced one step in terms of principle or technique since its inception. In its present state accreditation has to be considered an art without a vestige of science. With the measurement knowledge and accuracy available in present statistical and psychometric techniques, those responsible for the effectiveness of occupational education should insist that the assessment of occupational education be placed on a scientific basis and to that end the reliability and validity of presently used subjective and empirical standards and criteria must either be demonstrated or such standards and criteria must be abandoned.

Specialized Accrediting Agencies

Many of the observations and conclusions made concerning the regional associations apply equally to the specialized accrediting agencies, although the problem of specialized accreditation is not nearly as great an issue in public institutions offering postsecondary occupational education as is regional institutional accreditation. With the exception of a few of the paramedical specialities and certain fields of engineering, specialized accreditation is not widely sought by public institutions. The major issue concerning specialized accreditation is congressional action tying eligibility of public institutions for publicly appropriated funds to the requirement of specialized accreditation. Such an act makes such agencies quasi-legal and representatives of the public interest. Yet the study showed that few of these agencies or associations have bylaw provisions which will allow representation of the public interest by persons who have no vested interest in the decisions made or of occupational educators on policy-making boards. This is particularly true of the American Dental Association, the American Medical Association, the Engineer's Council for Professional Development, and to a lesser extent true of the other specialized agencies which accredit in the public realm. Notable exceptions to this are the accrediting agencies which accredit in the proprietary sector. Practically all of these have a large component, though never a majority, of board or commission members who have no vested interest in the decisions of the board and who could be broadly conceived as representatives of the public interest. The concept of representation of the public interest on the boards of the regional and professional associations is equally cogent in that they have also become vehicles by which public institutions are made eligible or ineligible for publicly appropriated monies. If these associations are unwilling to make needed changes, then they should refute this responsibility to society and make it clear to Congress that they have no interest in serving societal needs.

The Federal Government

The two major implications of the federal government's role in accreditation and evaluation of occupational education are found in the substantial amounts of funds earmarked for research efforts under various acts and in the activities of the Commissioner of Education, acting under congressional mandate, in the recognition of specialized and regional accrediting associations as arbiters of quality in education and, as such, determiners of recipients of federal funds. Certainly occupational educators should be concerned about the proportion of research funds spent to improve the evaluative process in occupational education and should act accordingly, but the activity of the federal government which concerns a major principle is that of recognition of accrediting agencies. To this time the regional associations and other recognized by the National Commission on Accrediting have been recognized without evaluation,but the newly created Accreditation and Institutional Eligibility Unit in the Bureau of Higher Education has established a timetable whereby each agency currently recognized must undergo evaluation by that Unit. The criteria that the Unit will use, as published by the Commissioner of Education, were analyzed in the study; and it is apparent that not all of these criteria are adequately met by the various specialized and regional associations. To this time these organizations have considered themselves completely autonomous and responsible only to their members. One can only speculate about what will happen if these criteria published by the Commissioner are rigorously applied and recognition is denied some of these associations. Such action could force a consideration of alternatives to the present approach such as the recognition of state agencies, the establishment of other accrediting agencies, or the establishment of federal machinery for nationwide accreditation.

The States

Analysis of data concerning state efforts in the evaluation of postsecondary occupational education added little knowledge of a scientific nature to that already ascertained. Scientific research concerning evaluation of occupational education is as lacking among the states as it is among the accrediting agencies, and apparently the same tacit assumptions are applied to the evaluative criteria used. Many of the states have, however, gone much further in the development of specific evaluative criteria which have some degree of objectivity than have the accrediting associations which are satisfied to use broad and subjectively state standards or "guides." While only seven states indicated the use of state accreditation, an additional nine have comparable formal programs of institutional evaluation. Also, many other states acknowledged the use of program or curriculum evaluation which, if applied to all programs, easily approaches institutional evaluation. When various factors are considered, it appears that evaluation as practiced by many of the states is equally as good or superior to that practiced by the regional associations. Certainly their resources and expertise are superior and their vested interests are only moderately greater than those of the accrediting associations.

In conclusion, the study of accreditation and evaluation of postsecondary occupational education has disclosed many weaknesses, inequities--even injustices. The time is at hand for a complete reformation of so-called "voluntary" accreditation as well as improvement in the techniques of evaluation. If accrediting agencies as they now exist refuse to heed the call for representation of the public interest and the demands of occupational education for equitable representation in policy-making, the adaptation of suitable administrative structures, the development of standards and criteria necessary and sufficient for the adequate evaluation of occupational education, and the application of scientific principles to the evaluative process, then more viable alternatives should be pursued.

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SIX GUIDELINES

developed by
The National Study for Accreditation of Vocational Technical Education
A Project of the American Vocational Association
1510 H Street, Northwest, Washington, D. C. 20005

Six guidelines have emerged from an early phase of the National Study for Accreditation of Vocational Technical Education, a project of the American Vocational Association, funded by the U. S. Office of Education Bureau of Research. The project is intended to develop standards, criteria, instruments, guidelines and procedures for use by agencies doing accrediting in the field of vocational technical education.

Synthesized from interviews with numerous leaders in accreditation and general and vocational education, the guidelines are:

1) Accreditation should promote accountability, and toward that end should be based on measurement of the product as well as the process.

2) Accreditation should encourage the collection of data about both process and product, and should encourage and provide assistance with research into the relationship between product success and process factors, thus utilizing the accreditation process to put the educational process itself on a more scientific footing.

3) Accreditation must continue to be in terms of the objectives of the institution or program; but those objectives should be so stated as to permit measurement of product success.

4) In line with item 3, objectives should be stated in such manner as to permit employers and other institutions to know what to expect of people who have completed any given program.

5) Accreditation should facilitate interchangeability of educational requirements, thus increasing freedom of movement up and between career ladders and eliminating any necessity to repeat education in order to advance in an occupational field or change fields.

6) Accreditation should be an educational process aimed at improvement of institutions and programs, as well as a means of identifying and certifying to the public those institutions and/or programs that meet minimum standards. Accreditation should be to an institution and/or program what education is to an individual.

The guidelines aim to reflect newest thinking in accrediting circles and to permit answers to criticisms such as:

1) Education is the only system that blames the product for its own failure. (Accountability)
2) Accreditation as presently practiced lacks validity and reliability. (Scientific basis)
3) Accreditation as presently practiced focuses on what may be irrelevancies. (False assumptions)
4) Accreditation tends to regiment, limit innovation, and institutionalize outmoded patterns. (Stagnancy)

Reactions and suggestions for improving the guidelines are invited.

T-644

THE NATIONAL STUDY FOR ACCREDITATION OF VOCATIONAL TECHNICAL EDUCATION

A PROJECT OF THE AMERICAN VOCATIONAL ASSOCIATION

The need has long been felt for a comprehensive and coherent plan for accreditation of occupational education on a national scale. This is necessary in order to assure quality in vocational education programs, to enhance the prestige of vocational education, to protect the public, and to assure equitable treatment of vocational education students.

Presently there is a wide diversity in procedures for accrediting institutions and programs.

It has now become more important than ever that order be brought out of the present confusion. Existing accrediting associations of stature and respectability are in the process of developing plans to serve vocational-technical institutions which have not previously been eligible. The American Vocational Association has been asked by important associations and commissions concerned with accreditation to undertake the development of guidelines and criteria, standards, and procedures which might become acceptable to all concerned accrediting bodies.

This project aims at developing evaluative criteria, standards, and procedures which can be applied to vocational-technical education at all levels regardless of its setting:

1. To provide a means for identifying quality programs for prospective students, their parents, guidance counselors, the public, and funding agencies.

2. To enhance the ability of vocational-technical education to meet the nation's manpower needs by maintaining and further improving its status and creating a deeper sense of professionalism among vocational educators.

3. To clarify purposes and objectives of vocational education, and provide means and stimulation for continuous self-evaluation and improvement in vocational-technical education.

The following steps in the study are planned:

A. Collection of Documents and Information on Criteria, Statements and Accrediting Procedures in Current Use. Emphasis will be upon obtaining materials in current use in the accrediting of vocational-technical education. They will be analyzed in light of the experience of users and the best thinking of specialists in accrediting and evaluation.

B. Review of Research in Evaluation and Accreditation and Analysis of Current Accreditation Practices in Light of Findings. In order to assure the establishment of a research base for the study, an examination will be made of research findings to determine the state of new knowledge and techniques in accreditation. The purpose will also be to see if better research procedures can be incorporated into the model under development, than have been used in the past, to insure greater objectivity, validity and reliability in the use of the accrediting procedures. Hopefully, also the accrediting procedures can be set up to include research into the educational process as a by-product of the massive effort and collection of data inherent in the accrediting process.

C. Development of Principles and Guidelines. The purpose here will be to construct a guide to the development of criteria and processes. This step will be concurrent with steps A and B and preliminary to the analysis of current accreditation standards, procedures, and practices in vocational education.

D. Development of Basic Standards. Building on steps A, B, and C, standards will be drafted and submitted to selected representative groups of vocational educators and specialists in educational evaluation and accrediting. Meanwhile the clientele of potential-user accrediting organizations and constituent institutions and programs will be kept informed and invited to send suggestions and to participate. Standards developed in step D would be those applicable to vocational education wherever offered. They would be a statement of what constitutes good vocational education, regardless of level, setting, sponsorship, or curriculum area -- the common core that vocational educators can agree on as essential to good vocational education.

E. Development of Procedures and Instruments for Field Use. Following agreement on basic standards, procedures and instruments will be developed for use in self-studies and in examinations by outside examiners. Such instruments will detail criteria by which achievement of standards can be measured, and will outline standard procedures to assure equitable and uniform application of standards on a nationwide basis. Procedures will be planned to encourage continual improvement of vocational education, as well as to measure whether minimum standards are met. Standards will be designed to provide goals toward which all vocational education can aspire, and the procedures and instruments to assist in measuring progress toward the goals.

E. (1) Development of Standards, Criteria, and Procedures for Specialized Areas. Development of such standards, criteria, and procedures as may be needed for specialized areas will need to follow and be consistent with step E. They will be needed for subject specialists who investigate specialized curricular areas in conjunction with overall evaluations, and for making self-studies.

F. Field Testing. A model or models created up to this point will be tested under controlled conditions.

G. Model Adjustment and Refinement. On the basis of experience gained in field testing, earlier designs will be refined.

H. Dissemination. A variety of media and methods will be employed to develop nationwide participation and understanding among groups for whom the standards and procedures are being developed. It is planned to ask accrediting agencies and other organizations in vocational education to include reports of study activities in their newsletters, to send letters directly to the institutions and/or programs concerned, to report through the AV Journal, to meet with representative people, and to keep in close touch with the accrediting organizations for whose use the standards, criteria and procedures are being developed. The end product of the study will be standards, criteria, and procedures which will be published and made available to the general public.

It is anticipated that a minimum of eighteen months will be necessary to conduct this study.

Definition: The terms "vocational," "technical," and "occupational" are used more or less interchangeably to refer to education programs that prepare for gainful employment regardless of level.